

**Exhibit #22**

**ENVIRONMENTAL PROTECTION ACT**

**VSS Catholic Communications**  
Minor Modification to Construction Permit  
KJWM  
Grand Island, NE

August 2010

CH 218C2

11.4 kW H & V

The applicant proposes the use of an existing registered tower (ASR #1023336), built in 1999. Since this tower was constructed before March, 2001 and the applicant does not propose to alter the footprint or profile of the structure, further environmental study was deemed unnecessary. The tower area is enclosed by a locked fence and RF warning signs are posted.

The proposed six-bay, circularly polarized antenna will be energized such that it produces 11.4 kW effective radiated power (ERP) in both the horizontal and vertical planes, from a center of radiation of 167 meters above ground. Using the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, and then by applying a combination of the element and array pattern as defined in E.P.A. study PB85-245868 ("**Engineering Assessment of the Potential Impact of the Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services**") the predicted level of RF non-ionization emissions at a position of 2 meters above ground (head-height) at the base of the tower for the proposed 6-bay ERI SHPX-6-AC (Type #3) antenna is 0.839 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ), which is 0.084 percent of the maximum for this controlled area.

After researching the Mass Media and ULS databases, it was determined that there are two other active, authorized sources of RF emissions on the tower. The contributions to the level of RF emission at ground level from each source are:

Call	Ch/Freq	Power (kW)	Height (m)	Level ( $\mu\text{W}/\text{cm}^2$ )	Max ( $\mu\text{W}/\text{cm}^2$ )	Percent (Controlled)
KJWM (New)	218	11.4 H/V	167	0.839	1000	0.084
WPND880*	2097.5	1.514 V	86.6	2.760	5000	0.055
KTVG-D**	16	1000 H	174	11.293	1616.7	0.699
Totals				14.892		0.838
* Worst case, without regard to vertical elevation field value at $-90^\circ$ .						
** Assumes use of high-gain UHF antenna, with 0.1 vertical elevation field value at $-90^\circ$ .						

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.