

**EXHIBIT # 22**  
**R.F. RADIATION COMPLIANCE STATEMENT**  
Channel 201 – 2.1 kW H & V DA  
PRC Denver-I, LLC  
KVOD  
January, 2009

Based on the manufacturer's vertical elevation graph (attached as page #2 of this document) the field at the nadir of the proposed antenna is zero. The antenna is mounted at 42.8 meters off the ground; therefore it should not enter substantially into the R.F. environment on the hill. The antenna will be mounted on an existing structure atop Colorow Hill. This location is one of the highest points of Lookout Mountain. The top of the mountain is home to other towers; however they are not in the immediate vicinity. The proposed 65 meter tower was built in April 1995 and as such is exempt from new environmental studies. Based on information provided by the applicant, the area is fenced, locked and gated and therefore is considered a "controlled" area.

There are three other broadcast antennas on the tower at this time.

KCFR, and KUVU share the same Shively Labs model 6810-8R-.75SS antenna (EPA Type #6). KCFR transmits with 50 kW ERP and KUVU transmits using 22.5 kW. Consequently, for purposes of this study both station operate into the same antenna with a combined ERP of 72.5 kW, polarized circularly. Based on the formulas expressed in the OST Bulletin, No. 65, Oct. 1985, "Evaluating Compliance with F.C.C. Specified Guidelines for Human Exposure to Radio Frequency Radiation", published by the Federal Communication Commission's Office of Science and Technology and applying the EPA measured type #6 field values, the proposed facility is predicted to produce a worst-case maximum R.F. non-ionization radiation level at a position six feet above the tower base (at head level based on the C.O.R. of 41 Meters minus 2 meters) of 0.344 microwatts per square centimeter which is 0.034 percent of the FCC maximum standard for the frequency in use. The tower site is secured with a locked and gated fence, so the "controlled" value maximum of 1000 microwatts per square centimeter was used to calculate the percent contribution.

The site is also the location of KRMA-TV, channel-six, which transmits at 100 kW using a high-gain VHF antenna. With a center 58 meters above ground, and by applying the OET 69 vertical elevation field recommendation of 0.2 for this antenna, we find that KRMA-TV produces 26.4 microwatts per square centimeter at a position 2 meters above the ground. This is 2.64 percent of the maximum for the frequency in use.

Therefore, the total contribution at head level at the base of the tower is 2.674 percent of the maximum.

There are two UHF two way radio antennas at the site, but these are categorically excluded by their combination of antenna height and ERP.

Further, KRMA-TV will likely terminate its operation at the site on the 17<sup>th</sup> of February of 2009. KCFR-FM has a CP to move off the site and plans to do so in the near future.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission as necessary. The applicant has an agreement with the other station at this location to reduce power or to terminate operations to protect workers from receiving in excess of the A.N.S.I. standard.

Consequently, the proposed FM station will be in compliance with the Commission's rules regarding exposure to workers or the general public to levels of radio frequency emissions in excess of the of the Federal Communications Commission standards.