

## Exhibit 35.1

# Compliance with Radiofrequency Radiation Guidelines

The potential for human exposure to non-ionizing radiofrequency radiation at the transmitter site has been evaluated. In addition to the proposed WOXL-FM operation, the transmitter site will also be shared with multiple FM Translator operations/proposals and two (2) TV facilities currently existing or authorized. There is one additional FM facility WLFA(FM) located on a separate but adjacent tower. There are no other known broadcast facilities within 315 meters of the shared site.

The proposed WOXL-FM – Biltmore Forest, NC analog facility will operate on CH243C2 (96.5 MHz) with a maximum effective radiated power (ERP) of 9.5 kW circular polarization. WOXL-FM will operate with a three (3) bay Shively model 6014-3/3–0.5SS broadband panel antenna mounted 54 meters AGL. The antenna bays are spaced 0.5  $\lambda$  (wavelength) apart. The antenna will use worst case EPA Type 1 elements as defined by FM Model Version 2.10 Beta issued March 22, 1995. Upon licensing of this new analog facility, the WOXL-FM – Biltmore Forest HD/IBOC facility will operate on CH243C2 (96.5 MHz) with -20 dBc power or 0.095 kW ERP circular polarization (H&V) ( $\text{Log}[0.01]*10 = -20 \text{ dBc}$ ). The HD/IBOC facility will broadcast a signal from the WOXL-FM main antenna mounted 54 meters above ground level (AGL). The common antenna will remain a three (3) bay Shively model 6014-3/3–0.5SS, 0.5  $\lambda$  (wavelength) spaced broadband panel antenna employing EPA type 1 elements as defined by FCC program FM Model Version 2.10b.

The proposed WTMT(FM) – Weaverville, NC analog facility (BLH-20101130AJK) operates on CH290C2 (105.9 MHz) with a maximum effective radiated power (ERP) of 9.5 kW circular polarization. WTMT(FM) operates with a three (3) bay Shively model 6014-3/3–0.5SS broadband panel antenna mounted 54 meters AGL. The antenna bays will be spaced 0.5  $\lambda$  (wavelength) apart. The antenna uses worst case EPA Type 1 elements as defined by FM Model Version 2.10 Beta issued March 22, 1995. The WTMT(FM) HD/IBOC facility (BDNH-20110517AFD) operates on CH290C2 (105.9 MHz) with -20 dBc power or 0.095 kW ERP circular polarization (H&V) ( $\text{Log}[0.01]*10 = -20 \text{ dBc}$ ). The HD/IBOC facility broadcasts a signal from the WTMT(FM) main antenna mounted 54 meters above ground level (AGL). The common antenna remains a three (3) bay Shively model 6014-3/3–0.5SS, 0.5  $\lambda$  (wavelength) spaced broadband panel antenna employing EPA type 1 elements as defined by FCC program FM Model Version 2.10b.

For purposes of this RF Compliance Study, the combined WOXL-FM analog and HD/IBOC and WTMT(FM) analog and HD/IBOC powers [9.5 kW(H&V)+0.095 kW(H&V)+9.5 kW(H&V)+0.095 kW(H&V) = 19.190 kW(H&V)] has been assumed as one contribution from the common antenna height of 54 meters AGL. The previously identified three (3) bay Shively model 6014-3/3–0.5SS, 0.5  $\lambda$  (wavelength) spaced broadband panel antenna employing EPA type 1 elements as defined by FCC program FM Model Version 2.10b has been employed.

A listing of all FM Translator facilities within 315 meters of the common site is as follows:

Call	City	ST	File Number	Fac ID	ERP	RCAGL
W220CD.L	ENKA	NC	BLFT-20100927AAF	90071	0.010kW	41m
<del>W247BV.C</del>	<del>CANTON</del>	<del>NC</del>	<del>BNPFT-20130731APU</del>	<del>141108</del>	<del>0.015kW</del>	<del>18m*</del>
W247BV.A	ASHEVILLE	NC	BMPFT-20131119BEK	141108	0.099kW	18m
<del>W251AO.L</del>	<del>ASHEVILLE</del>	<del>NC</del>	<del>BLFT-20080404ADP</del>	<del>137991</del>	<del>0.250kW</del>	<del>24m*</del>
W251AO.A	ASHEVILLE	NC	BPFT-20131023AKV	137991	0.250kW	24m
W258CA.C	WEST ASHEVILLE	NC	BNPFT-20130827ADD	147817	0.010kW	38m
W288CQ.A	ASHEVILLE	NC	BMPFT-20130909AAM	155786	0.250kW	24m

*\*The lesser power(s) of duplicated facilities have been omitted from this RF Study.*

To ensure maximum protection, the sum power level of the FM Translator facilities [0.010kW+0.099kW+0.250kW+0.010kW+0.250kW = 0.619 kW(H&V)] has been assumed in both the horizontal and vertical planes from the lowest listed Translator height of 18 meters AGL. In addition, to assure maximum protection, a worst case one (1) bay EPA type 1 element as defined by FCC program FM Model Version 2.10b has been assumed for the combined FM Translator contribution. None of the FM Translator services operate with HD/IBOC facilities at this time.

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The WLFA(FM) – Asheville, NC analog facility (BLED-1386) operates on CH217A (91.3 MHz) with a maximum effective radiated power (ERP) of 0.440 kW circular polarization with a COR mounted 8 meters AGL. No antenna make and model could be located therefore a worst case one bay EPA Type 1 element as defined by FM Model Version 2.10 Beta issued March 22, 1995 was employed for the purposes of this study. *It was noted that WLFA(FM) specifies operation from coordinates located 0.061 km (61 meters) away from this WOXL-FM proposal. It was also noted that the WLFA(FM) contribution exceeds the uncontrolled limit guidelines by itself. Therefore, for purposes of this study, the WLFA(FM) contribution has been analyzed at the 61 meter mark; or the WLFA(FM) contribution at the base of the WOXL-FM tower.*

Analog and digital TV contributions have been individually calculated using vertical plane pattern data from the manufacturer including relative field values throughout the range of depression angles that would place an observer within 315 meters of the tower. Manufacturers' antenna data will be supplied upon request.

The W41BQ.L – Asheville, NC, CH41-T (File No. BLTTL-19950626IG) facility specifies analog operation on TV Channel 41-T with a maximum effective radiated power (ERP) of 37.2 kW horizontal only polarization with a COR mounted 30 meters AGL. The operational antenna is listed as an Andrew ALP16L2-HSMR. Based on manufacturer's data, an aural power of 22% at a 0.3 field has been assumed. This W41BQ.L – Asheville, NC, CH41-T (File No. BLTTL-19950626IG) contribution has been calculated to be the lesser of the W41BQ facilities contributions, therefore this contribution has been omitted in favor of the worst cast W41BQ facility contribution. (See individual W41BQ facilities studies at the end of this report.)

The W41BQ.C – Asheville, NC, CH04-LD (File No. BDISDVL-20091015AAC) facility specifies digital operation on TV Channel 04-T with a maximum effective radiated power (ERP) of 0.3 kW horizontal only polarization with a COR mounted 30 meters AGL. The operational antenna is listed as a Scala DRV Panel Antenna. Based on manufacturer's data, a full 1.0 field has been assumed. This W41BQ.C – Asheville, NC, CH04-LD (File No. BDISDVL-20091015AAC) contribution has been calculated to be the lesser of the W41BQ facilities contributions, therefore this contribution has been omitted in favor of the worst cast W41BQ facility contribution. (See individual W41BQ facilities studies at the end of this report.)

The W41BQ.C – Asheville, NC, CH22-LD (File No. BDISDTL-20120119ABD) facility specifies digital operation on TV Channel 022-T with a maximum effective radiated power (ERP) of 2.5 kW horizontal only polarization with a COR mounted 30 meters AGL. The operational antenna is listed as a Jampro JASS-LOBE-22 Antenna. Based on manufacturer's data, a full 1.0 field has been assumed. This W41BQ.C – Asheville, NC, CH22-LD (File No. BDISDTL-20120119ABD) contribution has been calculated to be the greater of the W41BQ facilities contributions, therefore this contribution has been assumed to be the worst cast W41BQ facility contribution. (See individual W41BQ facilities studies at the end of this report.)

The distance of the antenna center of radiation above ground level is the shortest path to an observer on the ground. This distance, minus 2 meters for the height of the observer, was assumed for the television exposure study.

Software packages were used to determine the individual contribution of each station. FM radiofrequency radiation levels were predicted using both the array pattern, the calculations of which are based on the number of bays in the antenna and wavelength spacing between the bays, and the element pattern. The element pattern is determined by using measured element data prepared by the EPA. and published in "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM and TV Services," by Paul C. Gailey and Richard Tell - April 1985, U.S. Environmental Protection Agency, Las Vegas, NV. Both FM and TV programs use formulas were originally published in OST Bulletin No. 65, 1985.

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The results of the evaluations for all stations are shown in tabular form at the end of this report. The tabulation lists the portion of the tabular output for each station showing the region of maximum radiofrequency radiation. The locations of maximum predicted power density have been highlight. Graphs of all tabulations will be supplied upon request.

To evaluate the total exposure to non-ionizing radio-frequency radiation it is necessary to sum the individual contributions as a decimal fraction of the maximum permissible limit. If the resulting sum is less than or equal to 100%, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01). To simplify the calculations and produce a “worst case” study, the maximum exposure level produced by each station has been selected without regard to the location of that exposure. The following table is based on the uncontrolled limits set forth in OET Bulletin No. 65 (Edition 97-01).

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
WOXL-FM / WTMT(FM) (analog & HD/IBOC)	31.1502 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	15.58%
Combined Translator Contribution	97.1849 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	48.59%
WLFA(FM)	7.7323 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	3.87%
W41BQ.C (BDISDTL-20120119ABD)	106.5364 $\mu\text{W}/\text{cm}^2$	347.34 $\mu\text{W}/\text{cm}^2$	<u>30.67%</u>
		<b>Total % of Limit</b>	<b>98.71%</b>

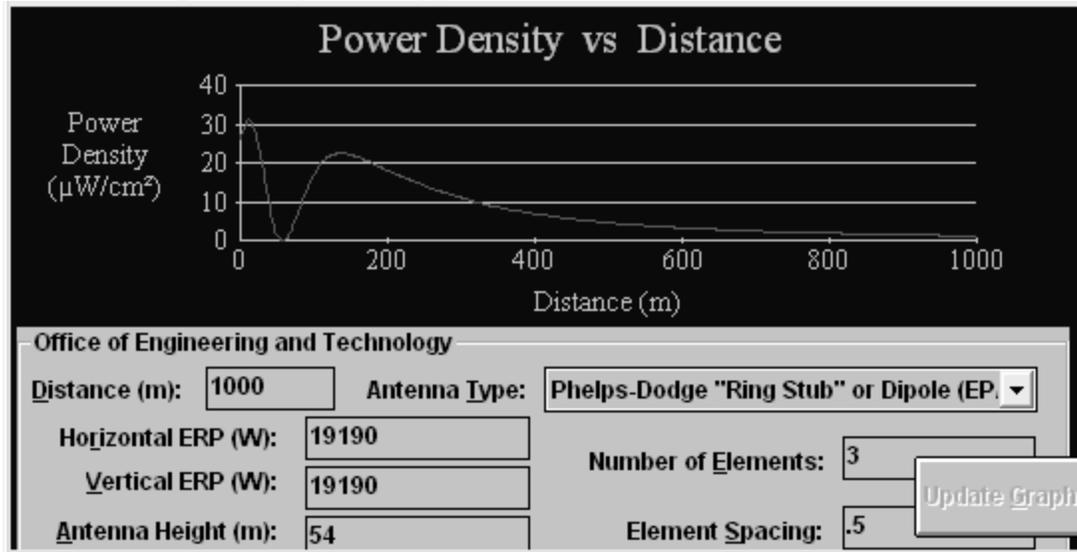
With the implementation of OET Bulletin No. 65 (Edition 97-01) and the accompanying Supplement A (Edition 97-01), the Commission set forth new guidelines for human exposure to radiofrequency radiation that employ a two-tiered system. The more lenient set of guidelines are for the “controlled environments”, which are defined as “locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment, by other cognizant persons, or as the incidental result of transient passage through areas where analysis shows the exposure levels may be above...” the more restrictive guidelines but below the more lenient guidelines. The second, more restrictive, set of guidelines is to be applied to “uncontrolled environments” which are defined as “locations where there is the exposure of individuals who have no knowledge or control of their exposure.” The table above sets forth an evaluation of the transmitter site based on the standards for “uncontrolled environments.”

Since the Total % of the Limit is less than 100% of the more stringent uncontrolled environment guidelines, the proposed installation will comply with the current FCC guidelines.

In addition to the protection afforded by the proposed antenna heights above ground, the facility is properly marked with signs, and entry to the facility is restricted by means of fencing with locked doors and/or gates. Any other means that may be required to protect employees and the general public will be employed.

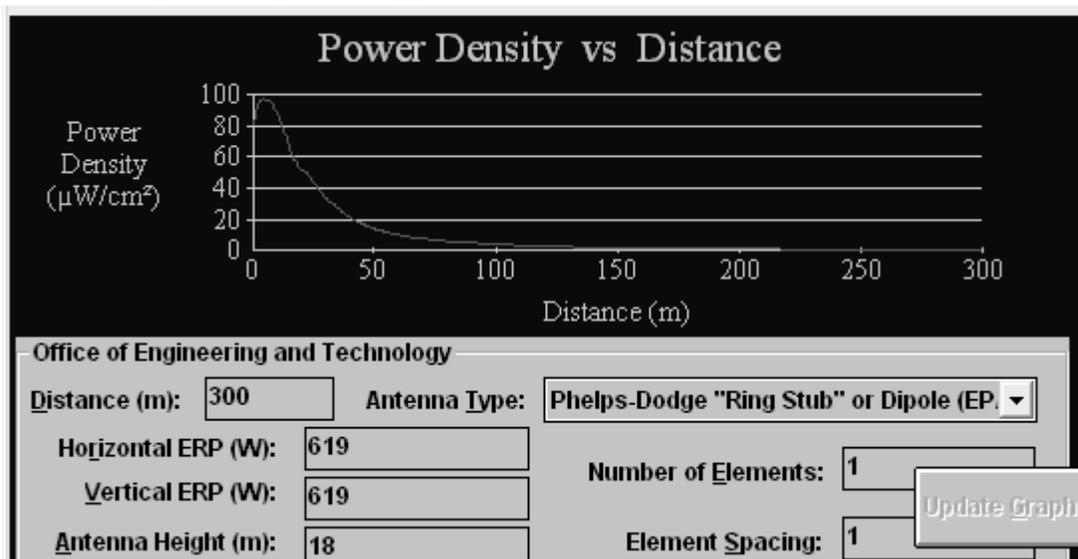
In the event work is required in proximity to the antenna(s) such that the person or persons working in the area will be potentially exposed to fields in excess of the current guidelines, an agreement signed by all broadcast parties at the site will be in effect for the offending transmitter(s) to reduce power, or cease operation during the critical period.

**PLOT OF TOTAL POWER DENSITY  
WOXL-FM & WTMT(FM) (Analog & HD/IBOC) Di-plexed Operations  
Using a 3-Bay EPA Type 1 Antenna Mounted 54 meters AGL**



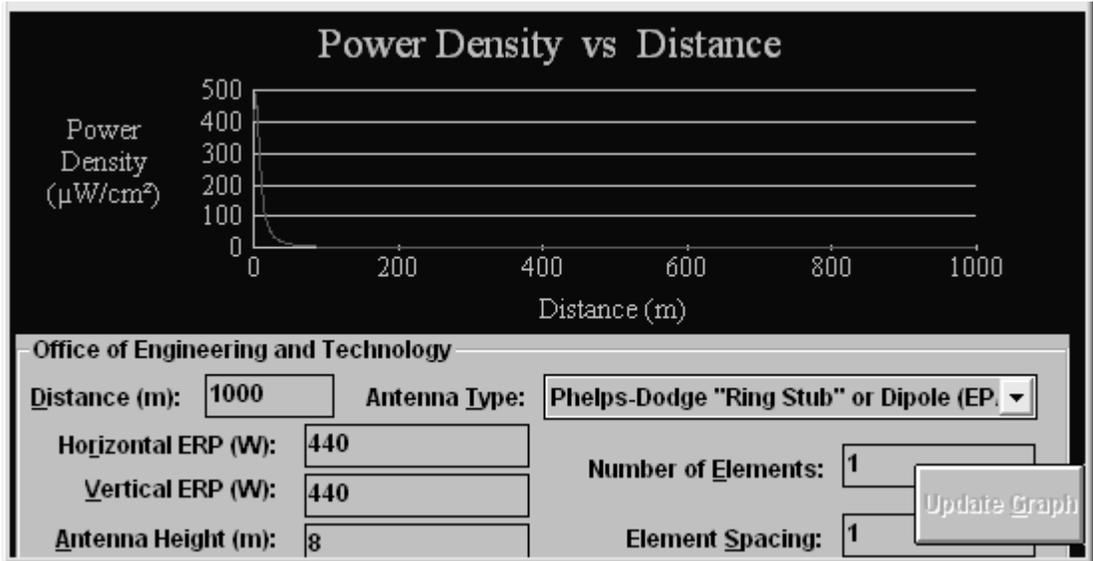
The Max Power Density was found to be 31.1501661531335  $\mu\text{W}/\text{cm}^2$  at 12 meters.  
Note: Graph resolution is 500 points.

**PLOT OF TOTAL POWER DENSITY  
Combined Translator Operations  
Using a 1-Bay EPA Type 1 Antenna Mounted 18 meters AGL**



The Max Power Density was found to be 97.1848827705866  $\mu\text{W}/\text{cm}^2$  at 4.2 meters.  
Note: Graph resolution is 500 points.

**PLOT OF TOTAL POWER DENSITY**  
**WLFA – Asheville, NC**  
**Using a 1-Bay EPA Type 1 Antenna Mounted 8 meters AGL**

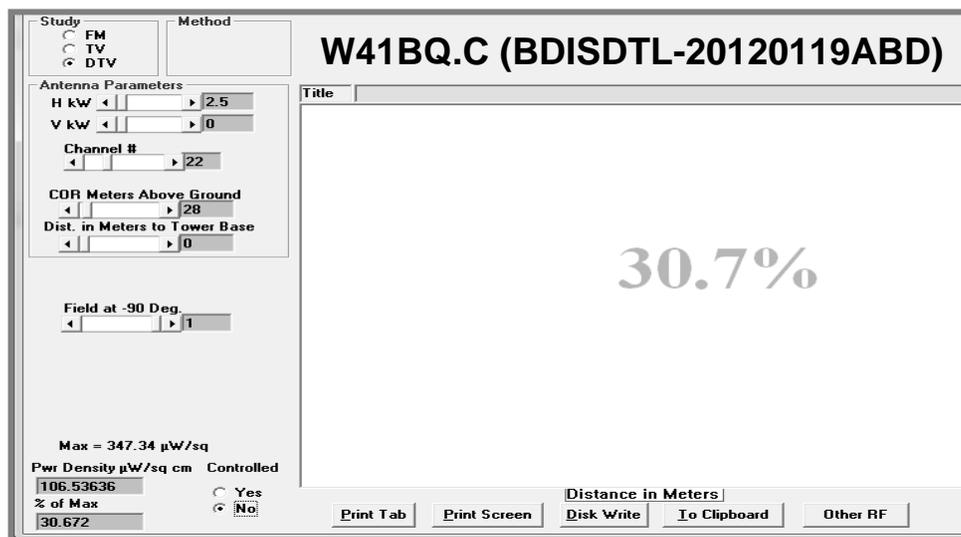
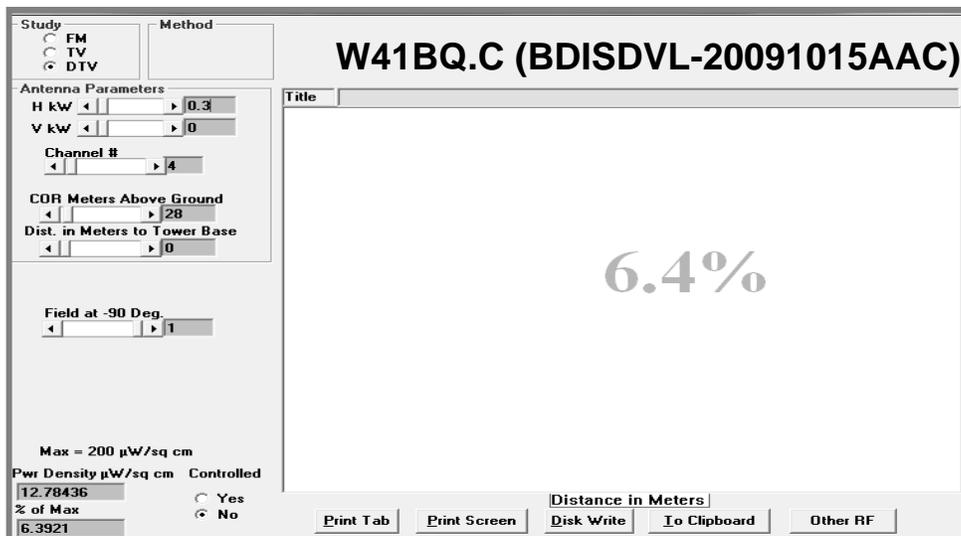
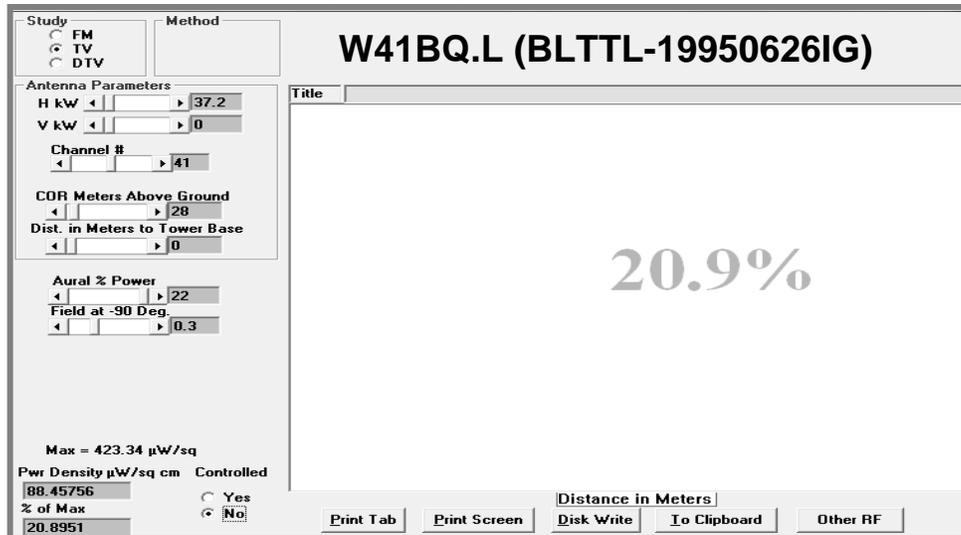


Distance (meters) = 1000  
 Horizontal ERP (W) = 440  
 Antenna Height (m) = 8  
 Number of Elements = 1  
 Y-axis (Linear) = -1  
 X-axis Setup = -1, 1000

Vertical ERP (W) = 440  
 Antenna Type = 1 (EPA)  
 Element Spacing = 1

X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)
0	408.34	34	24.047	68	6.2449	102	2.7970	136	1.5784	170	1.0119
1	477.63	35	22.751	69	6.0677	103	2.7433	137	1.5555	171	1.0001
2	489.16	36	21.556	70	5.8977	104	2.6912	138	1.5331	172	.98859
3	477.70	37	20.451	71	5.7347	105	2.6405	139	1.5112	173	.97723
4	437.86	38	19.429	72	5.5783	106	2.5912	140	1.4898	174	.96607
5	378.36	39	18.481	73	5.4283	107	2.5433	141	1.4689	175	.95509
6	324.64	40	17.600	74	5.2842	108	2.4967	142	1.4483	176	.94430
7	271.85	41	16.780	75	5.1457	109	2.4514	143	1.4282	177	.93370
8	256.16	42	16.016	76	5.0126	110	2.4073	144	1.4085	178	.92327
9	233.43	43	15.302	77	4.8846	111	2.3644	145	1.3893	179	.91301
10	202.58	44	14.635	78	4.7615	112	2.3226	146	1.3704	180	.90293
11	178.02	45	14.010	79	4.6429	113	2.2819	147	1.3519	181	.89301
12	157.94	46	13.425	80	4.5287	114	2.2423	148	1.3337	182	.88325
13	140.37	47	12.875	81	4.4186	115	2.2037	149	1.3160	183	.87365
14	123.02	48	12.358	82	4.3125	116	2.1661	150	1.2985	184	.86421
15	108.56	49	11.871	83	4.2102	117	2.1294	151	1.2815	185	.85492
16	96.425	50	11.412	84	4.1115	118	2.0937	152	1.2647	186	.84578
17	86.174	51	10.980	85	4.0162	119	2.0588	153	1.2483	187	.83678
18	77.453	52	10.571	86	3.9241	120	2.0248	154	1.2322	188	.82793
19	69.962	53	10.185	87	3.8352	121	1.9917	155	1.2164	189	.81921
20	63.485	54	9.8193	88	3.7493	122	1.9593	156	1.2009	190	.81064
21	57.851	55	9.4730	89	3.6662	123	1.9278	157	1.1857	191	.80220
22	52.922	56	9.1445	90	3.5859	124	1.8970	158	1.1708	192	.79388
23	48.811	57	8.8328	91	3.5081	125	1.8669	159	1.1562	193	.78570
24	45.281	58	8.5368	92	3.4329	126	1.8375	160	1.1418	194	.77764
25	42.112	59	8.2553	93	3.3600	127	1.8088	161	1.1277	195	.76971
26	39.259	60	7.9874	94	3.2895	128	1.7808	162	1.1139	196	.76190
27	36.682	61	<b>7.7323</b>	95	3.2211	129	1.7534	163	1.1003	197	.75420
28	34.346	62	7.4893	96	3.1548	130	1.7267	164	1.0870	198	.74662
29	32.223	63	7.2574	97	3.0906	131	1.7006	165	1.0739	199	.73916
30	30.288	64	7.0362	98	3.0283	132	1.6750	166	1.0611	200	.73181
31	28.521	65	6.8249	99	2.9679	133	1.6500	167	1.0484		
32	26.902	66	6.6229	100	2.9092	134	1.6256	168	1.0360		
33	25.415	67	6.4297	101	2.8523	135	1.6017	169	1.0238		

# PLOT OF TOTAL POWER DENSITY Analog and Digital TV Contributions



The "Dist to COR" value shown on the above graphs represent the height of the antenna center of radiation above an observer on the ground who is assumed to be 2 meters in height.