

EXHIBIT 44
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NONIONIZING RADIATION COMPLIANCE

Journal Broadcast Corporation
Lansing, MI

The proposed WSYM-DT facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. The proposed facilities will operate with a maximum effective radiated power of 912.0 kilowatts using a Jampro JSM-24/38SHBP horizontally polarized directional antenna mounted with its center of radiation at 284 meters above ground level on an existing 315.8 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin 65, details the calculation technique used to determine the power density at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (912.0 kilowatts) for the expression $[0.4ERP_V + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Utilizing the vertical radiation pattern data from Exhibit 41 in conjunction with this equation yields a predicted a worst case power density at two meters above ground level of $2.96 \mu\text{W}/\text{cm}^2$ from the proposed facilities, which will occur at a depression angle of 81° and at a horizontal distance of 44.7 meters from the base of the tower. Since the maximum permitted power density for uncontrolled exposure on TV Channel 38 is $409.3 \mu\text{W}/\text{cm}^2$, this amounts to only 0.72% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed WSYM-DT facilities are excluded from environmental processing and need not be considered in conjunction with other co-located and nearby facilities to establish uncontrolled exposure compliance with this standard.

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WSYM-DT, in conjunction with other co-located or nearby facilities, will also take appropriate steps to insure that workers who must climb this tower will not be exposed to power density levels that are in excess of the permitted level for controlled exposure. These steps will include a reduction in power or the cessation of operation by any or all stations, as appropriate, at any time that workers must be on this tower in any area where the total power density levels exceed the permitted level for controlled exposure.