

EXHIBIT 22.1

COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

This application for WLAB, Fort Wayne, IN has been evaluated for human exposure to non-ionizing radiofrequency radiation. The site will house multiple transmitters. Potential for exposure has been evaluated with regards to §1.1307(b)(3) concerning the five percent (5%) contribution rule for multiple transmitter sites.

The WLAB facility will operate on 88.3 MHz with a maximum effective radiated power (ERP) of 3.2 kW using circular polarization. The proposed antenna is expected to utilize two EPA Type 3 elements mounted one wavelength apart. This antenna will be mounted 183 meters above ground level (AGL).

This site has been evaluated for compliance with the FCC guidelines concerning human exposure to radiofrequency radiation. The standards employed are detailed in OET Bulletin No. 65 (Edition 97-01) and the accompanying Supplement A, as well as §1.1310 of the CFR Title 47.

A software package has been used to determine the individual contribution of the station. FM radiofrequency radiation levels were predicted using the array and element patterns. The array pattern was calculated using the number of bays in the antenna and wavelength spacing between the bays. The element pattern was determined through 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.

The evaluation results are shown in the attached screen capture of the FM Model program, which is available from the FCC Office of Engineering Technology. The display shows a graph of the predicted level of total power density, expressed in $\mu\text{W}/\text{cm}^2$, as well as a text box indicating the maximum expected value and its location.

To evaluate the total exposure to non-ionizing radio-frequency radiation with regards to the five percent contribution exclusion rule, it is necessary to express the individual contribution as a decimal fraction of the maximum limit. If the resulting contribution is less than or equal to 0.05 (5.0%), the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01) and §1.1307(b)(3). The maximum

predicted exposure of $0.937 \mu\text{W}/\text{cm}^2$ will occur at 121.5 meters (399 feet) from the base of the tower. This level represents 0.47% of the $200 \mu\text{W}/\text{cm}^2$ limit for the more restrictive uncontrolled environment where members of the general public may be exposed to radiofrequency radiation. Protection of the more restrictive uncontrolled limit implies protection of the controlled limit.

Since the maximum contribution of 0.047% for the uncontrolled environments is less than the 5.0% as set for by §1.1307(b)(3), the WLAB facility is in compliance with FCC guidelines. §1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where its contribution is less than five percent. Since this application meets the five percent exclusion test at all ground level areas, the impact of the proposed facility may be considered independently from other facilities operating at or nearby this site. It is believed the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b)(3).

In addition to the protection given by the proposed antenna height 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 taken.

In the event work that 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 to cease operation during the critical period.

PLOT OF TOTAL POWER DENSITY
WLAB – Fort Wayne, IN
Using a 2-Bay EPA Type 3 Antenna Mounted 183 meters AGL

