

## Exhibit 22.1

### COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

The RF Compliance Study for NEW CH211C3, Harbor Springs, MI, has been evaluated for human exposure to non-ionizing radiofrequency radiation at the transmitter site. The site will house multiple transmitters. The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has been evaluated with regards to §1.1307(b)(3) concerning the five percent (5%) contribution rule for multiple transmitter sites.

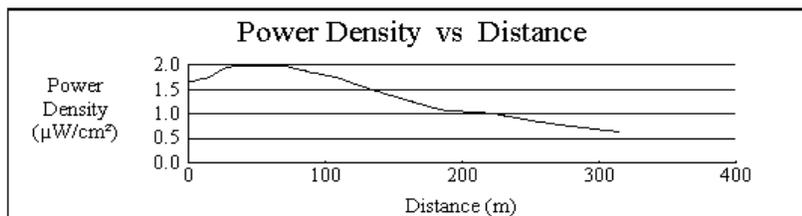
The proposed facility will operate on CH211C3, 90.1 MHz with a maximum effective radiated power (ERP) of 1.2 kW vertical and 1.2 kW horizontal polarization. The facility will operate with no less than a 2 bay antenna mounted 158 meters above ground level (AGL). However for purposes of this study, a worst case one bay EPA type 1 element was assumed as defined from FCC program FM Model Version 2.10b.

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). Software packages were used to determine the individual contribution of the 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. The programs use formulas that were originally published in OST Bulletin No. 65, 1985.

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 permissible limit. If the resulting contribution is less than or equal to 5.0%, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01) and §1.1307(b)(3). Protection of the more restrictive uncontrolled limit implies protection of the controlled limit.

Since the maximum contribution for the uncontrolled environments of  $1.9829 \mu\text{W}/\text{cm}^2$  is less than the 0.05 (5.0%) as set forth by §1.1307(b)(3), the 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 instant 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 afforded 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 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.



#### Office of Engineering and Technology

Distance (m):	<input type="text" value="315"/>	Antenna Type:	<input type="text" value="Phelps-Dodge 'Ring Stub' or Dipole (EP)"/>
Horizontal ERP (W):	<input type="text" value="1200"/>	Number of Elements:	<input type="text" value="1"/>
Vertical ERP (W):	<input type="text" value="1200"/>	Element Spacing:	<input type="text" value="1"/>
Antenna Height (m):	<input type="text" value="158"/>		

The Max Power Density was found to be  $1.98291586350308 \mu\text{W}/\text{cm}^2$  at 42 meters.

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