

# Exhibit 17.1

## Compliance with Radiofrequency Radiation Guidelines

The potential for human exposure to non-ionizing radiofrequency radiation has been evaluated at the proposed transmitter site. This remote mountain site will house multiple FM operations. Therefore, the standards employed here-in are detailed in OET Bulletin No. 65 (Edition 97-01) and are based on the "controlled" limits for restricted access sites such as this. There are no other known broadcast facilities within 315 meters of the shared transmitter site which operate with a power greater than 99 watts ERP.

The KXAZ(FM) - Page, AZ corrected analog FM station (Facility ID: 36340) will operate on CH227C2 (93.3 MHz) with 12.5 kW ERP circular polarization (H&V). The FM facility will broadcast from an antenna COR mounted 28 meters above ground level (AGL). The FM facility will operate with a five bay ERI G4CPM-5, "Ring and Stub" antenna employing EPA Type 1 approved elements as defined by *FM Model - Appendix B* issued March 31, 2016. This facility will not operate with HD/IBOC facilities at this time.

The K252FG.L - Page, AZ analog FM Translator (Facility ID: 141431) operates on CH252D (98.3 MHz) with 0.250 kW ERP circular polarization (H&V). The FM Translator broadcasts from an antenna COR mounted 17 meters above ground level (AGL). The FM Translator operates with a one bay Nicom BKG1/P-1DA(Slant45), "Dipole" antenna employing an EPA Type 1 approved element as defined by *FM Model - Appendix B* issued March 31, 2016. This facility will not operate with HD/IBOC facilities at this time.

FCC supplied software was used to determine the individual contribution of each FM station. The current *FM Model* web-based software application employs the standards as detailed in OET Bulletin No. 65 (Edition 97-01). FM radiofrequency radiation levels have been 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 has been 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. The results of the evaluation for the FM station have been shown at the end of this RF compliance discussion.

To evaluate the total exposure to non-ionizing radiofrequency radiation it is necessary to sum the individual contributions as a percentage of the maximum permissible limit. If the resulting sum is less than or equal to unity, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01). The table that follows provides the same information with respect to those locations defined as a "controlled environment" or consistent with the restricted access remote mountain top nature of this site location. The total decimal fraction is also shown.

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Controlled Environment Limit</u>	<u>Decimal Fraction of Limit</u>
KXAZ(FM) (FM analog)	754.594 $\mu\text{W}/\text{cm}^2$	1000 $\mu\text{W}/\text{cm}^2$	75.46%
K252FG(FM) (FM analog)	44.677 $\mu\text{W}/\text{cm}^2$	1000 $\mu\text{W}/\text{cm}^2$	4.68%
<b>Total Decimal Fraction:</b>			<b>80.14%</b>

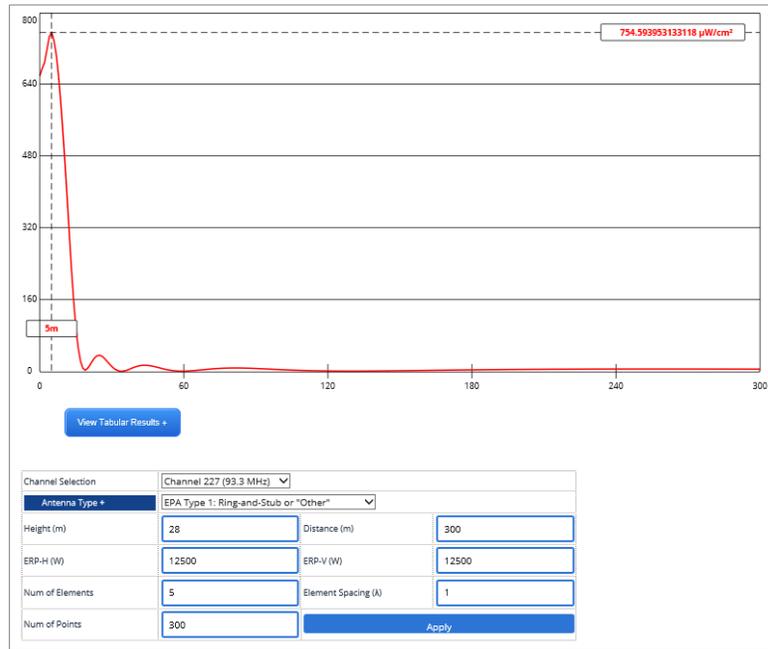
Since the total percentage is less than unity for the controlled environment, the operation of the combined transmitting plants is in compliance with the provisions of OET Bulletin No. 65 (Edition 97-01). There are no other broadcast sources of radiofrequency non-ionizing radiation present at this site.

In addition to the protection afforded by the existing fencing and the FM 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 as may be required to protect employees and the general public will be employed.

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

**Exhibit 17.1**  
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**PLOT AND TAB OF TOTAL POWER DENSITY**  
**Page, AZ - KXAZ(FM)**



**PLOT AND TAB OF TOTAL POWER DENSITY**  
**Page, AZ - K252FG**

