

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 site will house multiple AM and FM operations. The standards employed here-in are detailed in OET Bulletin No. 65 (Edition 97-01). 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 CH298D.P - Bucyrus, OH analog FM Translator (Facility ID: 142508) will operate on CH298D (107.5 MHz) with 0.250 kW ERP vertical only polarization. The FM Translator will broadcast from an antenna COR mounted 76 meters above ground level (AGL). The FM Translator will operate with a one bay Nicom BKG1/P-1DA(V), "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.

The WQEL(FM) - Bucyrus, OH analog FM Station (BLH-20060303AAO) operates on CH224A (92.7 MHz) with 3.0 kW ERP circular polarization (H&V). The facility broadcasts with an antenna COR mounted 86 meters above ground level (AGL). The station is licensed with a 4 Bay, 1.0 λ (wavelength) spaced, Harris FMC-4 "ring horn" antenna employing an EPA Type 1 approved element as defined by *FM Model - Appendix B* issued March 31, 2016.

The WQEL(FM) - Bucyrus, OH HD/IBOC FM signal (BDNH-20110822ADV) operates on CH224A (92.7 MHz) with -10 dBc power or 0.300 kW ERP circular polarization (H&V) ($\text{Log}[0.1 \text{ or } 10\%]*10 = -10 \text{ dBc}$). The HD/IBOC facility broadcasts a diplexed signal from the WQEL(FM) main antenna mounted 86 meters above ground level (AGL). The common antenna is licensed as a 4-Bay, 1.0 λ (wavelength) spaced, Harris FMC-4 "ring horn" antenna employing an EPA Type 1 approved element as defined by *FM Model - Appendix B* issued March 31, 2016.

For purposes of this RF Compliance Study, the sum WQEL(FM) Analog and HD/IBOC powers of 3.3 kW ERP circular polarization have been assumed as one single contribution into the common antenna.

The WBCO(AM) - Bucyrus, OH analog AM Station (BL-20071004ADY) operates on a frequency of 1540 kHz with a daytime only four tower directional power of 0.5 kW. The facility employs electrified radiators 112.8° or 0.313 λ (wavelengths) for operation on 1540 kHz. The radiators are comprised of 84.6° or 0.235 λ (wavelengths) vertical towers plus 28.2° or 0.235 λ (wavelengths) of toploading on each tower. Existing fencing is no less than 1 meter (3 feet) for each tower. WBCO(AM) does not presently broadcast with any HD/IBOC operation.

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 ensure complete protection, the maximum FM contribution has been assumed without regard for the AM restricted access fencing distance.

FCC supplied MININEC interpolated graphs were used to determine the individual contribution of each AM station. MININEC AM Model Figure(s) 1-4 have been taken directly from, and employ the standards of, OET Bulletin No. 65 (Edition 97-01). The relevant MININEC AM Model Figure has been shown in graphical form at the end of this report with the predicted electrical field (V/m) and magnetic field (A/m) noted. For each AM contribution, the maximum contribution has been assumed using the maximum power regardless of mode of operation or directional tower power distribution. The AM contribution(s) have been interpolated at the measured fencing distance.

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 an "uncontrolled environment." This includes locations where there could be exposure to the general public. The total decimal fraction is also shown.

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<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Environment Limit</u>	<u>Decimal Fraction of Limit</u>
CH298D (FM analog)	1.4538 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	0.727%
WQEL(FM) (FM analog & HD)	18.339 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	9.170%
WBCO(AM) (AM analog)	187.0 V/m	535.0 V/m	<u>35.021%</u>
		Total Decimal Fraction:	44.918%

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

In addition to the protection afforded by the existing AM 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.

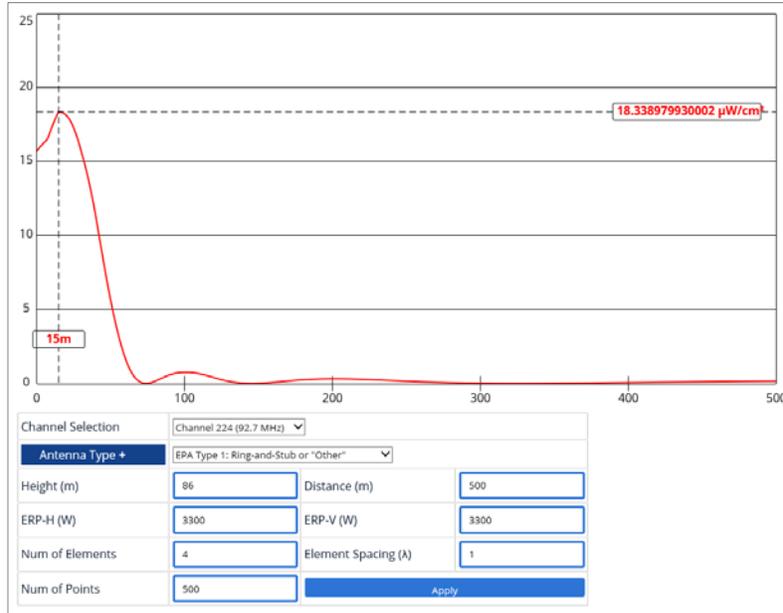
In the event work would be required in proximity to the antenna such that the person or persons working in the area would be potentially exposed to fields in excess of FCC guidelines, an agreement, signed by all broadcast parties at the site, is in effect for the offending transmitter(s) to reduce power,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

PLOT AND TAB OF TOTAL POWER DENSITY **Bucyrus, OH - CH298D**



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PLOT AND TAB OF TOTAL POWER DENSITY
Bucyrus, OH - WQEL(FM)



PLOT AND TAB OF ELECTRIC AND MAGNETIC FIELD STRENGTHS
Bucyrus, OH - WBCO(AM)

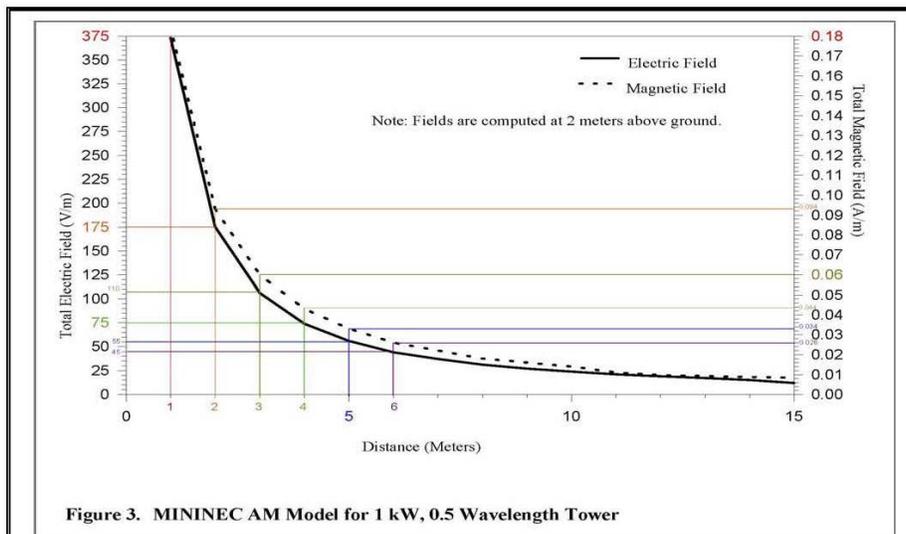


Figure 3. MININEC AM Model for 1 kW, 0.5 Wavelength Tower

For AM Frequencies 540 kHz to 1340 kHz		For AM Frequencies 1340 kHz to 1700 kHz	
Frequency: <input type="text"/>		Frequency: 1540 kHz	
Tower Element: 112.8° (0.313 A)		Power: 0.500 kW	
Electric Field	Magnetic Field	Electric Field	Magnetic Field
		Fencing: 1 meters	
		MININEC Value at 1 kW	265 V/m 0.127 A/m
		MININEC Value at Full Power*	187 V/m 0.090 A/m
		Uncontrolled Limit	535 V/m 1.422 A/m
		% of Limit	35.021% 6.315%

denotes [Value at 1 kW](sqrt(power in kW))