

Exhibit 29 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Citadel Broadcasting Company**  
WAAL(FM) Binghamton, Pennsylvania  
Facility ID 7920  
Ch. 256B 8.7 kW 291 m

**Nature of The Proposal**

*Citadel Broadcasting Company* (“*Citadel*”), licensee of WAAL(FM) Binghamton, New York, herein proposes to change the WAAL transmitter location, effective radiated power, and antenna elevation. Citadel proposes to employ an existing tower that has been assigned Antenna Structure Registration number 1016566. The transmitting antenna system will consist of a side-mounted, three-bay antenna at 150.0 meters above ground on an existing antenna support structure. A circularly polarized effective radiated power of 8.7 kilowatts will be employed.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission’s rules.

Based on information provided by the applicant, it is believed that the provisions of Section 1.1307(a)(1-7) would not apply in this case.

**Human Exposure to Radiofrequency Radiation**

In keeping with §1.1307(b) of the Commission’s Rules, the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines specified in §1.1310 of the Commission’s Rules. Under present Commission policy, a facility may be presumed to comply with the limits in §1.1310 of the Commission’s Rules if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

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Referencing the elevation pattern in the attached **Figure 3**, the proposed WAAL antenna will have a relative field of 0.4 or less from 20 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a relative field value of 0.4 is used for this calculation.

Under these assumptions, the proposed facility would contribute a power density of  $4.25 \mu\text{W}/\text{cm}^2$ , or 2.12 percent of the “general population/uncontrolled” limit at 2 meters above ground level. The “general population uncontrolled” limit for 99.1 Mhz is  $200 \mu\text{W}/\text{cm}^2$

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of various other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b).

### **Safety of Tower Workers and the General Public**

As demonstrated herein, excessive levels of RF energy will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission’s guidelines. Nevertheless, tower access will continue to be restricted and controlled by the site owner. An existing fence around the base of the tower will continue to be maintained to restrict access. Additionally, appropriate RF exposure warning signs will continue to be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must

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be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. *Citadel* will coordinate exposure procedures with all pertinent stations.

**Conclusion**

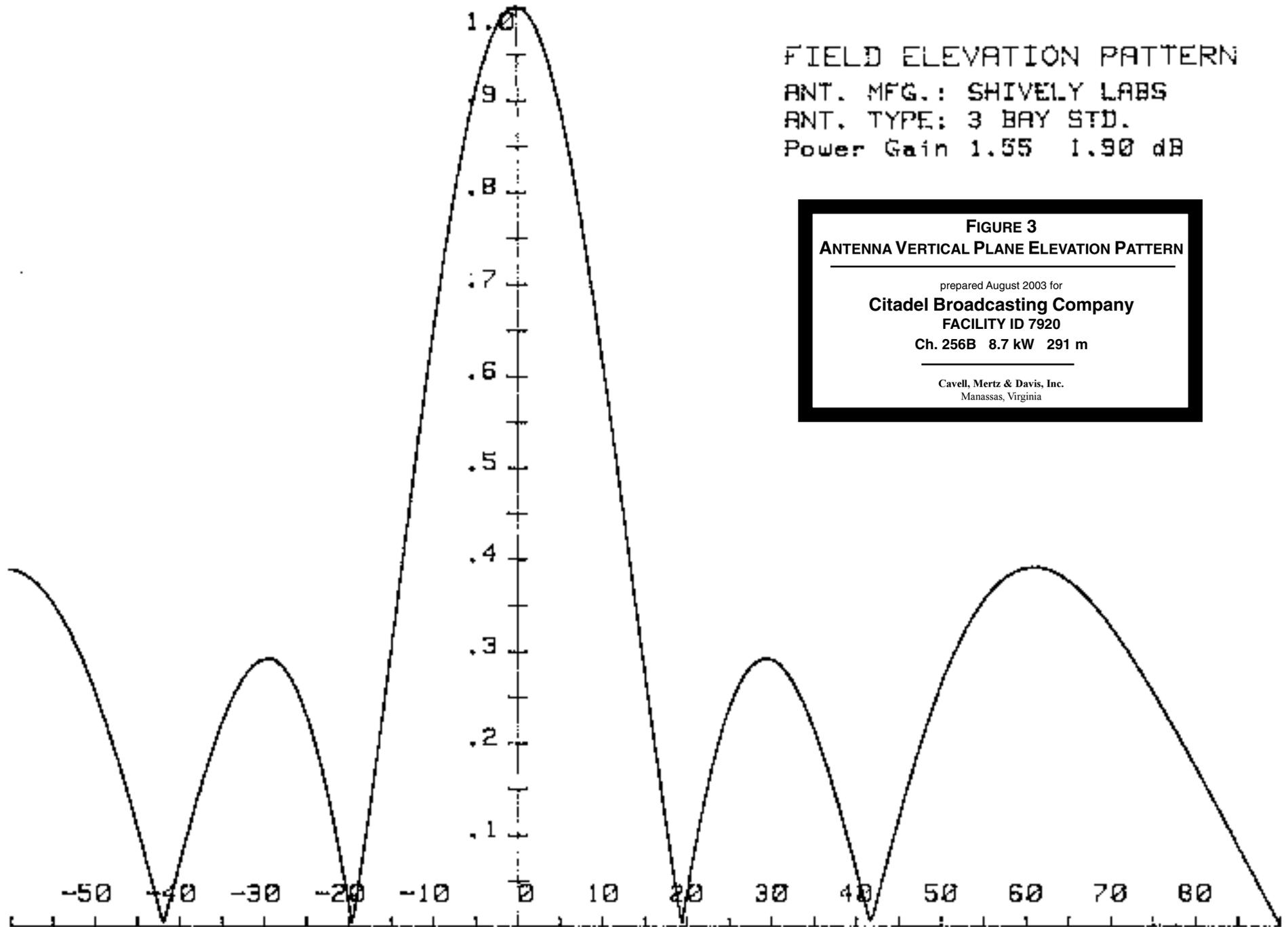
Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

FIELD ELEVATION PATTERN

ANT. MFG.: SHIVELY LABS

ANT. TYPE: 3 BAY STD.

Power Gain 1.55 1.90 dB



**FIGURE 3**  
**ANTENNA VERTICAL PLANE ELEVATION PATTERN**

prepared August 2003 for

**Citadel Broadcasting Company**  
FACILITY ID 7920

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Cavell, Mertz & Davis, Inc.  
Manassas, Virginia