

Exhibit 43 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
KHBS Hearst-Argyle Television, Inc.
KHBS-DT Fort Smith, Arkansas
Facility ID 60353
Ch. 21 325 kW 602 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Nature of The Proposal

KHBS Hearst-Argyle Television, Inc. ("*Hearst-Argyle*") is the licensee of analog station KHBS(TV) Channel 40, Fort Smith, Arkansas (file number BLCT-19840830KH). *Hearst-Argyle* has been granted a Construction Permit (BPCDT-19991101AEE) for the paired KHBS-DT, Channel 21, and has been granted special temporary authorization ("STA") (BDSTA-20020829ACK) to operate KHBS-DT from a tower adjacent to the structure presently authorized in the KHBS-DT CP. *Hearst-Argyle* herewith submits an application to modify the existing DTV Construction Permit to move to the adjacent tower on which the STA facility is operating.

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 Commission's Rules. No change in the overall structure height is proposed, thus no change in structure lighting or marking is anticipated as a result of the instant proposal. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radio-frequency Radiation

The proposed operation was evaluated for human exposure to Radio-frequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the Radio-frequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65.

Prepared by Mark Peabody, October, 2002

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Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The KHBS-DT antenna is installed such that its center of radiation is 58.8 meters above ground level. An effective radiated power (“ERP”) of 325 kilowatts, horizontally polarized, will be employed. The “uncontrolled/general population” limit specified in §1.1310 for Channel 21 (center frequency 515 MHz) is 343.3 $\mu\text{W}/\text{cm}^2$.

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, calculations were made to predict power density attributable to the proposed DTV facility at points two meters above ground level. Considering the theoretical elevation pattern of the proposed antenna system, (see **Exhibit 43 - Figure 1**), RF density levels attributable to the proposed KHBS-DT facility will reach a maximum of 3.8 percent of the “uncontrolled/general public” Maximum Permissible Exposure (“MPE”) limit at any location two meters above ground level. The attached **Exhibit 43 - Figure 2** provides a graph of calculated RF electromagnetic field attributable to the proposed KHBS-DT facility at locations two meters above ground level near the transmitter site.

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§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 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 any 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 or near 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 be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will 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 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. *Hearst-Argyle* will coordinate exposure procedures with all pertinent stations.

Conclusion

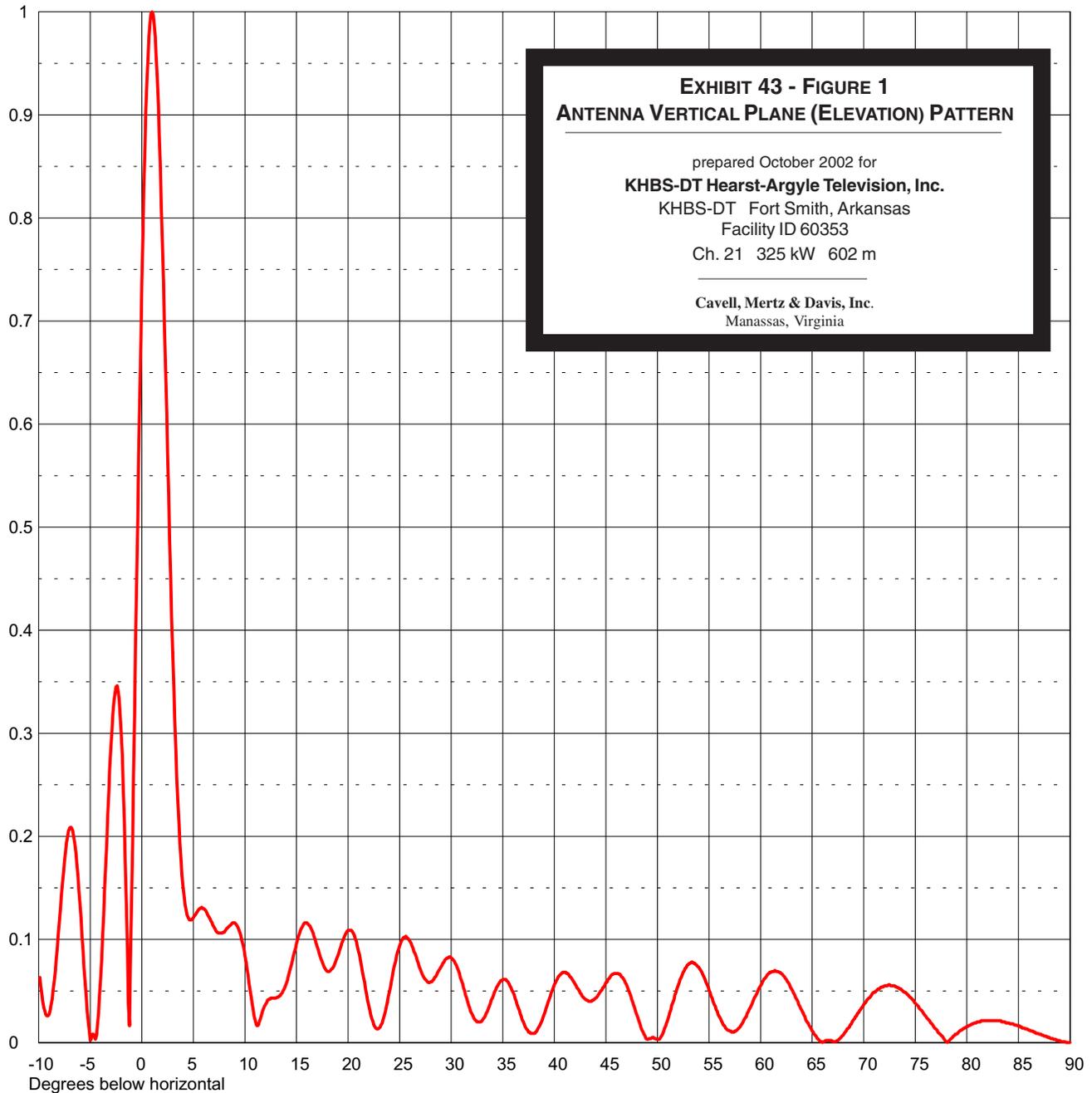
Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.



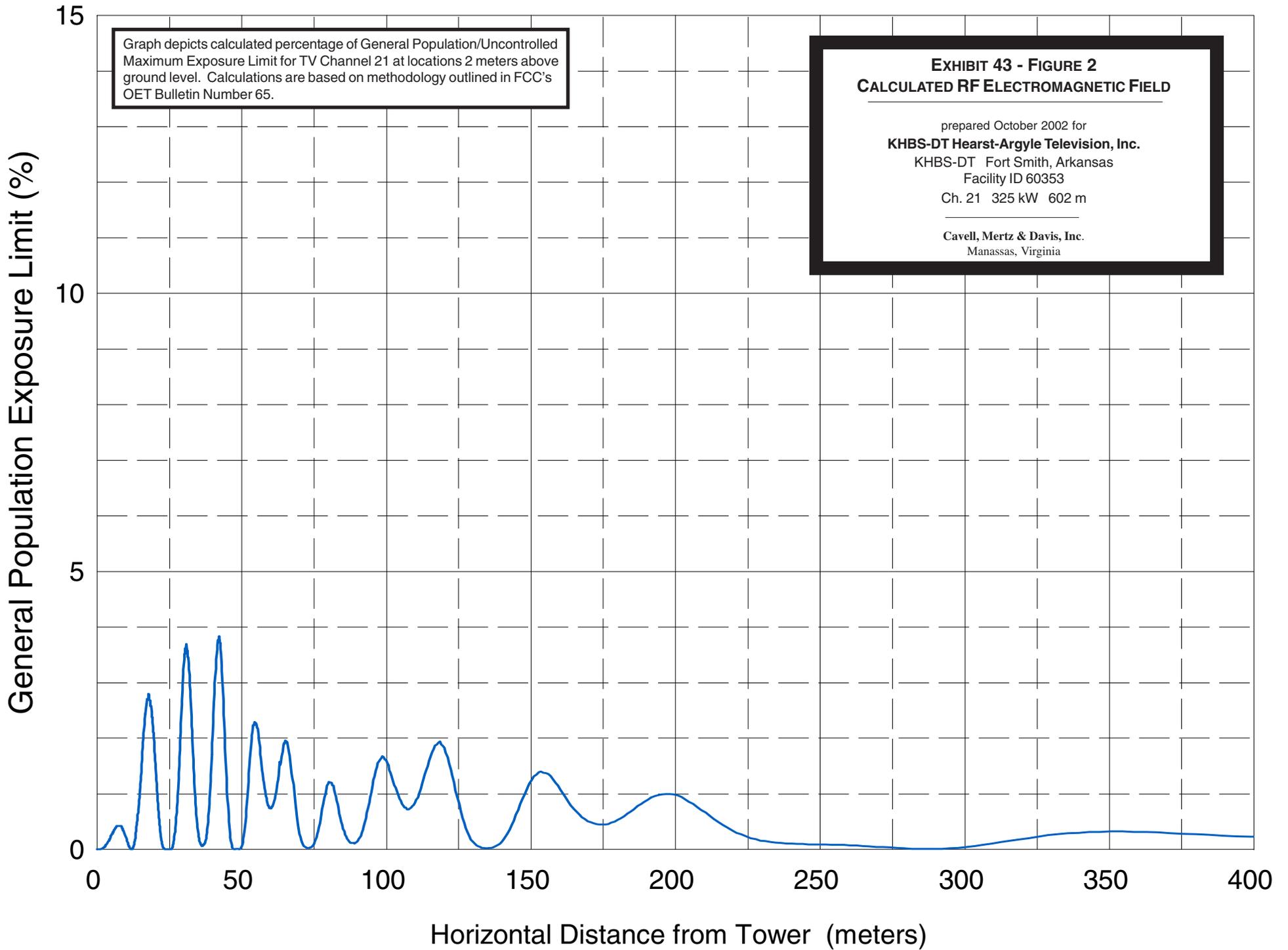
Date
Call Letters **KHBS-DT** Channel
Location
Customer
Antenna Type

ELEVATION PATTERN

RMS Gain at Main Lobe	22.0 (13.42 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	11.9 (10.76 dB)	Frequency	MHz
Calculated / Measured	Calculated	Drawing #	26Q220100-90



Remarks:



Graph depicts calculated percentage of General Population/Uncontrolled Maximum Exposure Limit for TV Channel 21 at locations 2 meters above ground level. Calculations are based on methodology outlined in FCC's OET Bulletin Number 65.

EXHIBIT 43 - FIGURE 2
CALCULATED RF ELECTROMAGNETIC FIELD

prepared October 2002 for
KHBS-DT Hearst-Argyle Television, Inc.
KHBS-DT Fort Smith, Arkansas
Facility ID 60353
Ch. 21 325 kW 602 m

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

ENGINEERING EXHIBIT

Application for Digital Television Station Construction Permit

prepared for

KHBS Hearst-Argyle Television, Inc.
KHBS-DT Fort Smith, Arkansas

Facility ID 60353
Ch. 21 325 kW 602 m

Table of Contents

FCC Form 301, Section III-D DTV

Exhibit 41

Statement A	Nature of Application, Allocation Considerations & Interference Analysis
Table I	Interference Analysis Results Summary
Table II	Class A Station Interference Analysis Results Summary

Exhibit 43

Statement B	Environmental Considerations
Figure 1	Antenna Vertical Plane (Elevation) Pattern
Figure 2	Calculated RF Electromagnetic Field

This material supplies a "hard copy" of the engineering portions of this application as entered October 22, 2002 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

Prepared by Mark Peabody, October, 2002

Cavell, Mertz & Davis, Inc.

	Height of Radiation Center Above Average Terrain :	602 meters																																																																																																																								
9.	Maximum Effective Radiated Power :	325 kW																																																																																																																								
10.	<p>Antenna Specifications:</p> <p>a. Manufacturer DIE Model TFU-26DSC-R O4</p> <p>b. Electrical Beam Tilt: 1 degrees <input type="checkbox"/> Not Applicable</p> <p>c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. [Exhibit 39]</p> <p>d. Polorization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical</p> <p>e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional)</p> <p>[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]</p> <div style="text-align: center; border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>10e. Directional Antenna Relative Field Values</p> <p>[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]</p> </div> <table border="1" style="width:100%; border-collapse: collapse; margin-bottom: 10px;"> <tr> <td colspan="12">e. Directional Antenna Relative Field Values:</td> </tr> <tr> <td colspan="12">Rotation (Degrees): <input type="checkbox"/> No Rotation</td> </tr> <tr> <th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th> </tr> <tr> <td>0</td><td></td><td>10</td><td></td><td>20</td><td></td><td>30</td><td></td><td>40</td><td></td><td>50</td><td></td> </tr> <tr> <td>60</td><td></td><td>70</td><td></td><td>80</td><td></td><td>90</td><td></td><td>100</td><td></td><td>110</td><td></td> </tr> <tr> <td>120</td><td></td><td>130</td><td></td><td>140</td><td></td><td>150</td><td></td><td>160</td><td></td><td>170</td><td></td> </tr> <tr> <td>180</td><td></td><td>190</td><td></td><td>200</td><td></td><td>210</td><td></td><td>220</td><td></td><td>230</td><td></td> </tr> <tr> <td>240</td><td></td><td>250</td><td></td><td>260</td><td></td><td>270</td><td></td><td>280</td><td></td><td>290</td><td></td> </tr> <tr> <td>300</td><td></td><td>310</td><td></td><td>320</td><td></td><td>330</td><td></td><td>340</td><td></td><td>350</td><td></td> </tr> <tr> <td colspan="2">Additional Azimuths</td><td colspan="10"></td> </tr> </table> <p>If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. [Exhibit 40] Exhibit required.</p>		e. Directional Antenna Relative Field Values:												Rotation (Degrees): <input type="checkbox"/> No Rotation												Degrees	Value	0		10		20		30		40		50		60		70		80		90		100		110		120		130		140		150		160		170		180		190		200		210		220		230		240		250		260		270		280		290		300		310		320		330		340		350		Additional Azimuths																					
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11.	<p>Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if Certification Checklist items 1(a), (b), or (c) are answered "No".) <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>If No, attach as an Exhibit justification therefore, including a summary of any previously granted waivers. [Exhibit 41]</p>																																																																																																																									
12.	<p>If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if Certification Checklist item 3 is answered "No".) [Exhibit 42]</p>																																																																																																																									
13.	<p>Environmental Protection Act. Submit in an Exhibit the following: [Exhibit 43] If Certification Checklist Item 2 is answered "Yes," a brief explanation of why an Environmental</p>																																																																																																																									

Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MARK PEABODY		Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature		Date 10/22/2002	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVENUE			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20109 -
Telephone Number (include area code) 7033929090		E-Mail Address (if available) MPEABODY@CMDCONSULTING.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Attachment 39

Attachment 40

Exhibit 41

Description: EXHIBIT 41 - ALLOCATIONS CONSIDERATIONS & INTERFERENCE ANALYSIS

ATTACHED AS EXHIBIT 41

Attachment 41

Description	Type	Conversion	
		Status	File
	Adobe		

Exhibit 41 - Allocation Considerations & Interference Analysis	Acrobat File	not needed	PDF
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Attachment 42

Exhibit 43

Description: EXHIBIT 43 - ENVIRONMENTAL CONSIDERATIONS

ATTACHED AS EXHIBIT 43

Attachment 43

Description	Type	Conversion	
		Status	File
Exhibit 43 - Environmental Considerations	Adobe Acrobat File	not needed	PDF