

EXHIBIT 15

KFRC-FM FCC 349 Application

CBS Radio Stations, Inc. (herein CBS), the licensee of KFRC-FM, San Francisco, CA proposes to construct an FM Booster, at an existing transmitter site within the 60 dBu Contour of KFRC-FM using 2 stacked vertically polarized Scala model CL-FM directional antennas, 10 kW average radiated power at 21 meters antenna radiation center height above ground.

An analysis has been made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition 97-01, prepared by the FCC Office of Engineering and Technology. A worst-case antenna factor 0.2 was used in lieu of elevation pattern. This analysis was made at a reference point two meters above ground level moving out from the base of the antenna until the point of maximum exposure was located.

At this point of maximum exposure, the calculated KFRC- FM Booster antenna power density is 30.30 microWatts/cm² which is 15.2% of the FCC MPE limit for general population/uncontrolled exposure, and 3.0 % of the FCC MPE limit for occupational/controlled exposure.

Since the KFRC- FM BOOSTER operation will contribute more than 5.0% of the most restrictive permissible exposure at any location on the ground at the multiple-user site, KFRC- FM BOOSTER is considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of KFRC- FM BOOSTER were taken into account in an additional analysis.

This analysis used a vertical ERP of 30 KW, as this is the total RF from boosters for stations KLLC (FM), KFRC-FM and KISQ-FM.

For this comprehensive analysis, a worst-case antenna factor 0.2 was used in lieu of elevation pattern. This analysis was made at a reference point two meters above ground level moving out from the base of the antenna until the point of maximum exposure was located.

At this point of maximum exposure, the calculated KFRC- FM BOOSTER antenna power density is 90.9 microWatts/cm² which is 45.5% of the FCC MPE limit for general population/uncontrolled exposure, and 9.1 % of the FCC MPE limit for occupational/controlled exposure.

If work is done on the tower in an area where over exposure could occur, CBS will take necessary action to prevent the overexposure of workers on the tower including reducing the KFRC- FM BOOSTER transmitting power or ceasing operation completely. In addition, CBS will cooperate with other site users to insure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The KFRC- FM BOOSTER antenna facility will utilize an existing supporting structure that is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest
2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since no change in the existing lighting is proposed.
3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.