

Exhibit 18 - Statement E  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Global Radio, L.L.C.**  
WNWR(AM) Bala Cynwyd, PA  
1540 kHz 50 kW DA-D  
Facility ID 1027

*Global Radio, L.L.C.* (“*Global*”) proposes herein to change only the community of license of WNWR to Bala Cynwyd, Pennsylvania. No change in tower placement, site construction, or operating parameters is proposed. Nevertheless, for completeness, the existing facility was evaluated herein for human exposure to radiofrequency radiation. According to information provided by the applicant, the existing facility does not have any significant environmental impact as defined under Section 1.1306 of the Commission’s Rules, and preparation of an Environmental Assessment is therefore not required.

**Human Exposure to Radiofrequency Radiation**

The proposed operation was evaluated for human exposure to radiofrequency 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 radiofrequency 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. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines. Guidance to broadcasters for evaluating exposure to RF energy is provided by “*Supplement A*” to OET Bulletin 65 (Edition 97-01), which was employed herein as follows:

The WNWR towers are effectively 90.0 electrical degrees (0.25 wavelengths) in height (81.7° with 8.3° of top-loading). Although the maximum 50 kW power will be distributed between the towers, a conservative, “worst case” assumption of 50 kW at each tower base was employed for this analysis. From “*Supplement A*,” Section 1, Table 2 of OET-65, it can be determined that the predicted distance to maintain from a 50 kW AM station (through the use of a fence, for instance) to achieve compliance with the FCC exposure limits is 4 meters if the involved tower is 0.25 wavelengths tall.

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According to information provided by technical representatives of the applicant, a fence that limits access to all towers, transmission lines, and the transmitter building encloses the entire WNWR transmitter site. At the closest points, the fence is no less than 24.4 meters (80 feet) from the base of a tower. RF exposure warning signs are posted at regular intervals that are visible from outside the fence. This distance far exceeds the 4 meters specified in OET-65.

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

As demonstrated herein, excessive levels of RF energy will not be caused at accessible areas near any of the towers. With respect to worker safety, a site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed in the vicinity of, or on a tower (or on adjacent tower structures). 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. No worker will be permitted to climb an energized tower. On-site RF exposure measurements may be undertaken, or the use of specific individual tower operating powers may be employed to establish more specifically the bounds of safe working areas or to revise the necessary protective fence distances.

**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.

# ENGINEERING EXHIBIT

## APPLICATION FOR CONSTRUCTION PERMIT

prepared for

**Global Radio, L.L.C.**  
WNWR(AM) Bala Cynwyd, PA  
1540 kHz 50 kW DA-D  
Facility ID 1027

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FCC Form 301, Section III-A

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Exhibit 14

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Exhibit 16

Statement C	Nighttime Allocation Considerations
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Exhibit 17

Statement D	Critical Hours Allocation Considerations
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Exhibit 18

Statement E	Environmental Considerations
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*This material supplies a “hard copy” of the engineering portions of this application as entered August 16, 2005 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.*

**SECTION III-A - AM Engineering****TECHNICAL SPECIFICATIONS**

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1.	Frequency: 1540 kHz
2.	Class (select one): <input type="radio"/> A <input type="radio"/> B <input type="radio"/> C <input checked="" type="radio"/> D
3.	Hours of Operation: <input type="radio"/> Unlimited <input type="radio"/> Limited <input checked="" type="radio"/> Daytime <input type="radio"/> Share Time <input type="radio"/> Specified Hours:
4.	<b>Daytime:</b> <input checked="" type="radio"/> Yes <input type="radio"/> No [Daytime Operation]
<b>4. Daytime Operation</b>	
a. Power: 50 kW	
b. Antenna Location Coordinates: (NAD 27)	
Latitude: Degrees 40 Minutes 2 Seconds 46 <input checked="" type="radio"/> North <input type="radio"/> South	
Longitude: Degrees 75 Minutes 14 Seconds 15 <input checked="" type="radio"/> West <input type="radio"/> East	
c. and d.	
Complete the appropriate following items. If additional space is needed, please provide the information [Exhibit 19] requested below in an Exhibit. <input type="radio"/> Nondirectional <input checked="" type="radio"/> Directional	
Theoretical RMS: 2195	mV/m per kW at 1 km (Nondirectional) mV/m at 1 km (Directional)
Standard RMS: 2306	mV/m at 1 km (Directional Only)
[Nondirectional Tower Subform]	
or	
[Directional Towers Subform]	
<b>4d. Directional Towers:</b>	
Tower Number	1
Overall height above ground (include obstruction lighting) (meters)	45.1
Antenna structure registration	Number: <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not Applicable

Height of radiator above base insulator, or above base, if grounded (meters)	44.2
Electrical height of radiator	0
Field ratio	0.651
Phase (degrees)	143.5
Spacing (degrees)	90
Tower orientation (degrees CW from True North)	316
Tower reference switch	0
Top-Loaded/Sectionalized apparent height (degrees)	
A	81.7
B	8.3
C	0
D	0

Tower Number	2
Overall height above ground (include obstruction lighting) (meters)	45.1
Antenna structure registration	Number: <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not Applicable
Height of radiator above base insulator, or above base, if grounded (meters)	44.2
Electrical height of radiator	0
Field ratio	1
Phase (degrees)	0
Spacing (degrees)	20
Tower orientation (degrees CW from True North)	281
Tower reference switch	0
Top-Loaded/Sectionalized apparent height (degrees)	
A	81.7
B	8.3
C	0
D	0

Tower Number	3
Overall height above ground (include obstruction lighting) (meters)	45.1
Antenna structure registration	Number: <input type="checkbox"/> Notification filed with FAA <input checked="" type="checkbox"/> Not Applicable

Height of radiator above base insulator, or above base, if grounded (meters)	44.2
Electrical height of radiator	0
Field ratio	0.512
Phase (degrees)	-123.5
Spacing (degrees)	90
Tower orientation (degrees CW from True North)	136
Tower reference switch	0
Top-Loaded/Sectionalized apparent height (degrees)	
A	81.7
B	8.3
C	0
D	0

**Augmented:** ☒ Yes ☐ No

If "yes," complete the following:

Augmented RMS: 2425 mV/m at 1 km

[Augmentations Subform]

**Augmentations:**

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
20	10	1013.89

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
25	10	1094.35

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
34	18	1190.91

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
47	26	1311.62

Azimuth	Span	Augmentation radiation
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(degrees)	(degrees)	(mV/m at 1 km)
60	10	1472.55

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
87.5	13	3336.4

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
94	13	3726.44

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
112	36	4395.57

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
134	42	4633.67

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
155	30	4332.35

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
236	26	656.61

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
256	18	1255.29

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
265	18	1046.07

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
275	20	402.34

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
288	24	366.93

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
300	24	402.34

Azimuth (degrees)	Span (degrees)	Augmentation radiation (mV/m at 1 km)
316	32	458.66

5. **Nighttime:** ☐ Yes ☒ No  
[Nighttime Operation]

6. **Critical Hours Operation:** ☐ Yes ☒ No  
[Critical Hours Operation]

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

#### CERTIFICATION

7. <b>Broadcast Facility.</b> The proposed facility complies with the engineering standards and assignment requirements of requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650. <b>Exhibit Required</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 11]
8. <b>Community Coverage.</b> The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 12]
9. <b>Main Studio Location.</b> The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 13]
10. <b>Interference.</b> The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 14]
<b>Groundwave.</b> <input checked="" type="checkbox"/> a.) 47 C.F.R. Section 73.37.	[Exhibit 15]
<b>Skywave.</b> <input checked="" type="checkbox"/> b.) 47 C.F.R. Section 73.182.	[Exhibit 16]
<b>Critical Hours.</b> <input checked="" type="checkbox"/> c.) 47 C.F.R. Section 73.187.	[Exhibit 17]
11. <b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 18]



By checking "Yes" above, 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.	
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**PREPARERS CERTIFICATION ON PAGE 3 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 MICHAEL D. RHODES		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 8/16/2005	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVE.			
City MANASSAS	State or Country (if foreign address) VA		Zip Code 20109 -
Telephone Number (include area code) 7033929090	E-Mail Address (if available) MIKE.RHODES@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

#### Exhibit 3

**Description:** OTHER MASS MEDIA INTERESTS

THE MEMBERS OF THE APPLICANT HOLD COLLECTIVELY 71.66% OF THE SHARES OF NEW WORLD RADIO, INC., THE LICENSEE OF STATION WUST(AM), WASHINGTON, D.C. (FIN: 48686). MR. WEITZMAN IS THE PRESIDENT, SECRETARY, TREASURER, AND A DIRECTOR OF NEW WORLD. MR. EDWIN TORNBERG, A U.S. CITIZEN, THE TRUSTEE OF THE EDWIN TORNBERG LIVING TRUST, IS THE VICE PRESIDENT AND DIRECTOR OF NEW WORLD. THE MEMBERS OF THE APPLICANT CONSTITUTE ALL OF THE MEMBERS OF NATIONS RADIO, LLC, THE LICENSEE OF STATION WBIS(AM), ANNAPOLIS, MARYLAND (FIN: 19554). THEY ALSO CONSTITUTE ALL OF THE MEMBERS OF POTOMAC RADIO, LLC, THE PROPOSED ASSIGNEE, IN FCC FILE NO. BAL-20050728AMR, OF THE LICENSE FOR STATION WAGE(AM), LEESBURG, VA (FIN: 54876). THE WAGE APPLICATION IS CURRENTLY PENDING BEFORE THE COMMISSION. MR. WEITZMAN IS THE MANAGER OF BOTH NATIONS RADIO AND POTOMAC RADIO.

#### Attachment 3

#### Exhibit 5

**Description:** LOCAL MULTIPLE RADIO OWNESHIP RULE COMPLIANCE

WNWR IS THE SOLE MASS MEDIA INTEREST HELD BY THE COGNIZABLE OWNERS AND OPERATORS OF THE APPLICANT IN THE PHILADELPHIA, PA RADIO MARKET AS DETERMINED BY ARBITRON RADIO AND REPORTED BY BIA. ACCORDINGLY, THE APPLICANT IS IN COMPLIANCE WITH THE COMMISSION'S LOCAL RADIO MULTIPLE OWNERSHIP RULES.

#### Attachment 5

**Exhibit 11****Description:** EXHIBIT 11 - NATURE OF THE PROPOSAL, DAYTIME ANTENNA SYSTEM DESCRIPTION

EXHIBIT 11 - NATURE OF THE PROPOSAL, DAYTIME ANTENNA SYSTEM DESCRIPTION - ATTACHED AS A PDF DOCUMENT

**Attachment 11**

Description
<a href="#">Exhibit 11</a>

**Exhibit 14****Description:** EXHIBIT 14 - DAYTIME ALLOCATION, COVERAGE CONSIDERATIONS

EXHIBIT 14 - DAYTIME ALLOCATION, COVERAGE CONSIDERATIONS - ATTACHED AS A PDF DOCUMENT

**Attachment 14**

Description
<a href="#">Exhibit 14</a>

**Exhibit 15****Description:** SEE EXHIBIT 14**Attachment 15****Exhibit 16****Description:** EXHIBIT 16 - NIGHTTIME ALLOCATION CONSIDERATIONS

EXHIBIT 16 - NIGHTTIME ALLOCATION CONSIDERATIONS - ATTACHED AS A PDF DOCUMENT

**Attachment 16**

Description
<a href="#">Exhibit 16</a>

**Exhibit 17****Description:** EXHIBIT 17 - CRITICAL HOURS ALLOCATION CONSIDERATIONS

EXHIBIT 17 - CRITICAL HOURS ALLOCATION CONSIDERATIONS - ATTACHED AS A PDF DOCUMENT

**Attachment 17**

Description
<a href="#">Exhibit 17</a>

**Exhibit 18****Description:** EXHIBIT 18 - ENVIRONMENTAL CONSIDERATIONS

EXHIBIT 18 - ENVIRONMENTAL CONSIDERATIONS - ATTACHED AS A PDF DOCUMENT

**Attachment 18**

Description
<a href="#">Exhibit 18</a>