

EXHIBIT 18 - AMENDED
ENVIRONMENTAL PROTECTION ACT
WPEN, PHILADELPHIA, PENNSYLVANIA
950 kHz 43 kW D/21 kW N DA-2
MARCH 2008

Section 1.1306

Since there is no change in the licensed site, the environmental issues listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those have not been addressed.

An evaluation has also been made to determine compliance with the FCC specified standards for human exposure to RF radiation as set forth in the OST Bulletin No. 65 dated August 1997. According to Table 2 in Supplement A to OST Bulletin 65 (Edition 97-01), the Maximum Permissible Exposure (MPE) for specified electric and magnetic fields ("worst case") would be 4 meters from the base of the tower for a transmitter power of 50 kW assuming there is 50 kW power into each tower (WPEN is proposing 43 kW). Therefore, the distance of 4 meters overstates the minimum distance at which the aforementioned field levels may be exceeded for the three individual towers.

The WPEN(AM) towers currently have a fence with locked gate and appropriate warning signs to block off a 15 meter area around the towers. The security fencing and locked gate at the base of each tower prevents access to the towers.

With respect to work performed on the tower structures or inside the fenced area, the station has establish written procedures including reducing or terminating the transmitter power to ensure that workers are not exposed to levels of RF Fields in excess of the Commission's guidelines.

The Commission guidelines for the AM band are the same (614 V/m Electric Field and 1.63 A/m Magnetic Field) for the occupational/controlled environment and for the general population/uncontrolled environment. For the reasons stated above, this proposal does not involve any action specified in Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.