

Exhibit 18 - Statement C  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
WBGX Harvey, Illinois  
Facility Id 40147  
1570 kHz 1.5 kW-D 0.5 kW-N DA-2 U

*Great Lakes, Inc.* (“*Great Lakes*”) proposes herein only to increase the daytime operating power of its existing transmitting facilities of WBGX(AM), Harvey, Illinois. No actual tower construction is required; therefore, an environmental study in accordance with Section 1.1306 of the Commission’s Rules is not believed to be necessary for the use of the existing towers. Only the impact of human exposure to radiofrequency energy is evaluated herein and certified by the preparer as required by the Commission Rules.

The proposed operation at this site 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 Section 1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in Section 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 those guidelines.

At the WBGX frequency, the effective electrical height of the tower is 0.222 wavelengths (86.5 degrees). WBGX is proposing to operate with 1.5 kW daytime into a four tower array and continuing its licensed three tower 0.5 kW nighttime operation. Although the maximum 1.5 kW power will be distributed between the towers, a conservative, *worst-case* assumption of 1.5 kW at each tower base was employed for this analysis. From Table 1 of Worksheet 3 of the FCC Form 301 Instructions (based on Supplement A, Section 1, Table 1 of OET 65), it can be determined that the predicted distance to maintain from a 5 kW AM station (through the use of a fence, for instance) to achieve compliance with the FCC exposure limits is 2 meters if the involved tower is between 0.21 and 0.40 wavelengths tall.

According to information provided by technical representatives of the applicant, each tower is currently enclosed by a 6 m x 6 m, locked, chain link fence and the fences are located at least

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2 meters from the base of each of the towers. Therefore the existing fences will be sufficient to limit exposure of the general public at the proposed 1.5 kW power level. Appropriate warning signs will continue to be posted at each tower base.

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

As demonstrated herein, excessive levels of RF energy will not be caused at accessible areas near the tower. With respect to worker safety, a site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed in the vicinity of or on the tower. Such protective measures include, but are 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. Further, no worker is permitted to climb an energized tower. On-site RF exposure measurements may also be undertaken to more specifically establish the bounds of safe working areas.

**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.