

Exhibit 12

WGCE-CA

Greece and Rochester, NY

Environmental Statement

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Site Environmental Issues

The proposed site for this digital television facility is an existing building with an antenna supporting pole previously constructed. The building, ASR Number 1004495 has been in existence and is properly lighted according to all FAA and FCC rules and regulations. This facility proposes to mount the antenna on an existing pole on top of the building with center of radiation at 7.3 meters above roof level. The effective radiated power will be 15.0 kW directional at 280 Degrees True. For the purposes of this study, a worst case formula is used for the DTV facility at this site. The form factor of the antenna is 0.2 for this Antenna Concepts ACS16AR antenna.

No external physical changes are being made to the site.

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A worst case formula for the power density of an FM, DTV and TV station is:

$$S = \frac{(33.4)F^2(ERP)}{R^2}$$

where:

S = highest power density in microwatts/sq.cm predicted at ground level

F = typical relative field factor in the downward direction (-60 to -90 elevation. For this calculation, F=0.2)

R = distance from ground to center of radiation in meters

ERP = Effective Radiated Power in watts

The maximum allowed power density for general population uncontrolled exposure for this channel 25 digital television is $357.3 \mu\text{W}/\text{cm}^2$. At the base of the pole, on the roof, the calculated power density for WGCE-CA is $376.06 \mu\text{W}/\text{cm}^2$. The expected decrease in energy into the building from the roof structure is approximately 12 db minimum. Thus the top floor level is expected to experience a power density level of $23.73 \mu\text{W}/\text{cm}^2$ or less, well under the maximum allowed for uncontrolled exposure.

In addition, the top floor of the building is 6.1 meters (20 feet) high and is unoccupied. The floor contains elevator equipment. Assume that the roof does not exist. This would place the floor at 13.4 meters below the center of radiation of the proposed antenna. Based on these figures, the power density level at 2 meters above this floor would be $154.2 \mu\text{W}/\text{cm}^2$, far below the maximum allowed even without the attenuation of the roof structure. The actual power density levels in this unoccupied area are expected to be even lower. And in the occupied levels of the building the power density levels will be lower still. The area will be clearly marked and access limited to informed maintenance personnel.

Should the Commission require, Milachi Media will conduct measurements on this system to determine the non-ionizing radiation levels outside on the roof and inside the building. Remedial steps will be taken if necessary to eliminate any human protection issues with this proposed installation. The roof area and top floor of this building is not accessible to the general public. The applicant certifies that, in coordination with other users of the site, it will reduce power or cease operation as necessary to protect persons having access to the roof or top floor of the proposed site.