

Exhibit 29 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**WPLJ-FM Radio, Inc.**  
WPLJ(FM) (*Auxiliary*) New York, New York  
Ch. 238B 19 kW 245.8 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

**Nature of The Proposal**

*WPLJ-FM Radio, Inc.* ("WPLJ") herein proposes to locate the auxiliary facility for WPLJ(FM) New York, New York on an existing tower structure (the "Alpine" tower), which is a long established communications site. A top mount antenna system is proposed herein, however no overall height change is proposed for the existing tower. Based on information provided by the applicant, it is believed that the provisions of Section 1.1307(a)(1-7) would not apply in this case.

Additionally, the use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Further, inasmuch as no tower height increase is proposed, no change is anticipated in obstruction marking and painting requirements. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the FCC Rules.

**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.

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*WPLJ* proposes to mount the auxiliary antenna system at 127.9 meters above ground level. A circularly polarized effective radiated power (“ERP”) of 19 kilowatts will be employed. On a “worst-case” assumption (90E downward field of 100 percent), using the formulae from OET 65, the proposed facility would contribute RF levels of  $80.1 \mu\text{W}/\text{cm}^2$  at two meters above ground level near the tower base, or 40.0 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

For the case at hand, the applicant is proposing the use of a two bay, half wave spaced, *Shively* (Model 6810) antenna system. According to elevation pattern data provided by the antenna manufacturer, the proposed antenna will have a relative field of 20 percent or less from 53 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 20 percent relative field is used to provide a more refined calculation. Accordingly, using the height and power information described above, the formulae from OET 65, and the more realistic (yet still conservative) elevation pattern assumption of 20% field, the proposed facility would contribute RF levels of  $3.2 \mu\text{W}/\text{cm}^2$  at two meters above ground level near the tower base, or 1.6 percent of the general population/uncontrolled limit.

Section 1.1307(b)(3) of the Commission’s rules states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where its contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of other facilities at or near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

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

**Cavell, Mertz & Davis, Inc.**

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As demonstrated herein, excessive levels of RF energy will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will continue to be restricted and controlled. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas on the ground. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed the tower in areas where high RF levels may be present. 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. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate tower access with other users.

**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.