Exhibit 13 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

WYFF Hearst Television Inc.

W10AK Spruce Pine, North Carolina

Facility ID 53935

Ch. 10 (Digital "Flash-Cut") 50 W (Max-DA)

Introduction

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

WYFF Hearst Television Inc. ("Hearst") herein proposes to "flash-cut" television translator station W10AK to digital operation. No change in site, tower, or overall height is proposed. According to FCC program TOWAIR, there the existing antenna structure does not need to be registered. 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. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radiofrequency Electromagnetic Field

The proposed operation was evaluated for human exposure to radiofrequency electromagnetic field 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.

The W10AK Channel 10 antenna is centered 31.7 meters above ground level. An effective radiated power of 50 Watts, horizontally polarized, will be employed. The "general population/ uncontrolled" limit specified in §1.1310 for Channel 10 (center frequency 195 MHz) is 200 $\mu W/cm^2$.

OET 65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET 65.

$$\mathbf{S = (33.4098)\ (F^2)\ (ERP)\ /\ D^2}$$

Where:

S = power density in microwatts/cm^2
ERP = total (average) ERP in Watts
F = relative field value
D = distance in meters

Using this formula and considering a conservative antenna elevation pattern of 100% relative field, the power density was calculated at a reference point 2 meters above ground level. Using this methodology, the power density of the proposed facility is calculated to reach 1.9 μW/cm² or 1.0% of the "general population/ uncontrolled" limit.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of various other facilities 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 ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at 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, site access will continue to be restricted by the surrounding rugged terrain. Additionally, appropriate RF exposure warning signs will continue to be posted.

A site exposure policy is employed protecting maintenance workers from excessive exposure when work must be performed on the tower 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 exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.