

## EXHIBIT 31

### ENVIRONMENTAL ASSESSMENT

This environmental assessment is required per the revised FCC's rules in Section 1.1305 and Section 1.1307(b). This exhibit has been included to address standard environmental issues and to also address the issue of allowable radio frequency radiation levels. WPHD Comfort Hill Proposed will be mounted on a pre-existing radio tower in a tower farm area.

This environmental assessment has been included to address the issue of allowable radiofrequency radiation levels (RFR). WPHD Comfort Hill Proposed would conform to the FCC guidelines with respect to OET Bulletin No. 65 (Edition 97-01, August 1997), "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields." Included as Subpart 1 of this exhibit is a printout showing the FCC's Power Density Program from the FCC's own website. The type of antenna indicated in Subpart 1 is a 4 Bay Half Wave Spaced Armstrong FMA-707-4E-HW Circularly Polarized antenna ("worst case" used). This is the currently operating WPHD main antenna and will be moved to the proposed site. The results show that WPHD would have a predicted power density value at ground level of 0.002 mW per square cm. The maximum power density guideline is 0.2 mW per square cm and five percent of this value is 0.01 mW per square cm. Pursuant to Section 1.1307(b) of the FCC's Rules, the power density contributions of co-located and nearby broadcast stations are not required to be calculated as WPHD Comfort Hill Proposed's power density contribution is 0.002 mW per square cm, less than five percent of the maximum power density guideline value of 0.2 mW per square cm, the FCC maximum permissible uncontrolled/general population RF exposure guideline.

In addition to showing that this proposed minor change to WPHD meets the new OET bulletin No. 65 guidelines for a safe center of radiation, it should be noted that the transmitting tower will be appropriately marked with warning signs. When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction of power or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency electromagnetic fields will not exceed the FCC guidelines. All of this information thus proves conclusively that this application conforms to the new FCC guidelines with respect to OET Bulletin No. 65 (Edition 97-01, August 1997), "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields."