

Exhibit 20 – Statement F
Application for Construction Permit
WZHF Capitol Heights, Maryland (FCC Facility ID 73306)
1390 kHz 9 kW – D 1 kW – N DA-2
Prepared November 2013 for
Way Broadcasting Licensee, LLC

Environmental Considerations

As discussed in **Exhibit 13 – Statement A**, this proposal specifies the use of the long existing WJFK transmitter site. This WZHF application proposal does not require tower construction or changes to any of the existing tower structures. According to the notes contained in FCC Rules Section 1.1306, the use of existing towers and sites has been deemed to be an environmentally desirable alternative to the construction of new tower facilities. Accordingly, a grant of the proposed request for a diplexed operation at the WJFK transmitter site is excluded from the provisions of Section 1.1306 of the FCC’s Rules and is not subject to environmental processing.

Potential RF Exposure Considerations - FCC Rule Section 1.1306(b)

The proposed operation was evaluated for human exposure to radio frequency energy using the procedures outlined in the Commission’s OET Bulletin No. 65 (“OET-65”). Although the entire site is completely enclosed by a chain link fence as illustrated in **Exhibit 13 – Figure 5**, WZHF proposes to add a further enclosure for each tower consisting of an additional fence, further limiting access to an energized tower. Accordingly, all present and proposed participants will be taken into account in the following analysis to establish the tower base fence distances.

Since this site will host more than one transmitting station, consideration is given to the potential impact of all participants. It is proposed to diplex the WZHF 9 kW directional “daytime” (and 1 kW directional “nighttime”) system with the existing WJFK 50 kW directional daytime (and 0.27 kW directional nighttime) antenna array. Additionally, as discussed in **Exhibit 13 – Statement A**, an application has been filed to diplex WUST into the WJFK directional array. WUST proposes a 50 kW into a daytime directional array, and 3 kW non-directional operation during critical hours. No other known RF emitters are located within a kilometer of this site.

For establishing conservative tower fence distances, a “worst case” scenario can be developed by assuming that 9 kW is being fed into each tower by WZHF, 50 kW by WJFK, and 50 kW by WUST. Based upon these power levels, an initial analysis of RF levels using the methodology of OET-65 indicates that a suitable fence distance from each tower base should be 7.62 meters (25 feet). A summary of the individual calculated electrical and magnetic fields is provided below, along with a summary of the resulting percentages. As shown, the calculated total electrical field at the fence perimeter would be 73.1% of the uncontrolled/general population limit while the calculated magnetic field would be 94.7% of this limit.

Exhibit 20 – Statement F (continued)
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Uncontrolled/Gen Pop Environment

<u>WJFK</u>	<u>MPE</u>	<u>Value</u>	<u>Percent</u>
E (V/m):	521.52	59.26	1.29%
H (A/m):	1.386	0.734	28.04%
<u>WZHF</u>	<u>MPE</u>	<u>Value</u>	<u>Percent</u>
E (V/m):	592.81	103.81	3.07%
H (A/m):	1.575	0.404	6.58%
<u>WUST</u>	<u>MPE</u>	<u>Value</u>	<u>Percent</u>
E (V/m):	614	509.06	68.74%
H (A/m):	1.63	1.26	60.09%
Total E (V/m):		73.10%	
Total H (A/m):		94.71%	

Actual operating values should be less since the transmitter power from each station will be distributed between the four towers. As such, it is expected that excessive levels of RF energy will not be caused at accessible areas near any of the towers or at the site since the site will be secured by a perimeter fence and the above described fences around each tower base. RF exposure and warning signs will also be posted. Members of the general public are thus not expected to be exposed to RF energy in excess of the FCC's published guidelines.

Safety of Tower Workers and the General Public

With respect to worker safety, a site exposure policy will be employed protecting authorized workers from excessive exposure when work must be performed in the vicinity of or on the tower. 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, occupancy time limits, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. Further, no tower worker will be permitted to climb an energized tower. On-site RF exposure measurements may also be undertaken to establish, to a more precise extent, the bounds of safe (controlled) working areas. The applicant will cooperate with all other users of the site to ensure that general population or occupational RF exposure guidelines will not be exceeded.

Conclusion

Based on the preceding, it is believed that the instant WZHF proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules.