



## Exhibit 31

### Environmental Impact Statement

Chisholm Trail Broadcasting Co.  
Channel 239C3  
Lahoma, Oklahoma

This proposed modification application does not involve any of the environmental probations listed in Section 1.1311 of the Commission's Rules. Construction will not be a major environmental action.

The antenna for the proposed 239C3 facility will be energized such that it produces 14.1 kW ERP circularly polarized from a center of radiation 115 meters above ground. The proposed facility will utilize an ERI model SHPX-6AC6 6 bay antenna.

By using the formulas expressed in OST Bulletin, No.65, October 1985, "Evaluating Compliance with F.C.C. Specified Guidelines for Human Exposure to Radio Frequency Radiation", published by the Federal Communications Commission's Office of Science and Technology, and then by applying a combination of the element and array pattern as identified in E.P.A. study PB85-245868 ("Engineering Assessment of the Potential Impact of the Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services") using an ERI circularly polarized antenna, it can be shown that the proposed antenna generates a maximum of 4.012 microwatts per square centimeter at a distance of 25 meters from the tower base, and 6 feet above the ground. This value amounts to 2.0064 percent of the **uncontrolled** maximum, and 0.4013 percent of the **controlled** maximum.

Access to the tower will be restricted with a fence and a locked gate. Signs will be posted warning of the radiation hazard. Company procedures have already been established to protect workers who must climb the tower. The transmitting power of the station will be reduced, or completely turned off to insure that these workers will not be exposed to excessive radiation levels.



Respectfully Submitted,

William H. Nolan  
Managing Member  
Broadcast Technical Associates, LLC