

Exhibit 22 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**The Wheeler School**  
WELH(FM) Providence, Rhode Island  
Facility ID 66656  
**Ch. 201A 1.2 kW (Max DA) 78.0 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**

*The Wheeler School ("Wheeler")*, licensee of WELH(FM)(Ch. 201A, Providence, Rhode Island) herein seeks to amend its pending Application for Construction Permit (File Number BPED-20070906AGD). The proposed facility would operate on Channel 201 (88.1 MHz) with an effective radiated power ("ERP") of 1.2 kW utilizing a directional, vertically polarized antenna to be located at a height above ground level ("HAG") of 56.4 meters. The support structure is an existing tower (ASR 1038231) having an overall height of 298 meters above ground. The instant proposal will not change the overall height of the supporting structure.

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. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. 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 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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Plans have not yet been finalized regarding the transmitting antenna system. Therefore, for the purpose of this study, a conservative elevation plan relative field of 85% was considered. A vertically polarized, effective radiated power (“ERP”) of 1.2 kilowatts will be employed.

The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm <sup>2</sup>
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, power density was calculated at a point 2 meters above ground level at the base of the existing tower structure. The proposed facility will contribute a maximum power density of 9.8 μW/cm<sup>2</sup> or 4.9 percent of the general population/uncontrolled limit<sup>1</sup>. This field will reduce at locations farther from the tower due to the increasing distance from the transmitting antenna.

§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 will not be caused by the proposal at publicly accessible areas at ground level near the antenna supporting structure. Consequently,

<sup>1</sup> The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 of the FCC Rules for FM broadcast frequencies is 200 μW/cm<sup>2</sup>.

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members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will be restricted and controlled and 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 at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed 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 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 Section 1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.