

EXHIBIT 18

Compliance With Environmental Rules

Statement

The proposed operation of KRAE will utilize the existing nondirectional antenna presently employed by KFBC, Cheyenne, Wyoming, for the diplexed operation of the two stations. The KFBC antenna tower is a registered antenna supporting structure and is owned by the County of Laramie. The transmitting facilities for the proposed daytime operation of KRAE do not fall into any of the categories listed in Sections 1.1307(a)(1) through 1.1307(a)(3), and Sections 1.1307(a)(5) through 1.1307(a)(7) of the Commission's Rules, and will not involve utilization of high intensity white lights described in Section 1.1307(a)(8) of the Rules.

With respect to the requirements of Section 1.1307(a)(4) of the Rules, the diplexed operation of KRAE and KFBC will not require any change in the overall height above ground of the existing Laramie County tower. The diplexed operation will require changing the antenna tower configuration from the present grounded shunt-fed radiator with slant-wire feed system to a folded unipole radiator configuration; the skirt wires (and related brackets and insulators) to be added to the tower will not protrude significantly from the structure. The Laramie County tower was constructed prior to March 2001. Accordingly, modification of the antenna tower for the diplexed operation of KRAE and KFBC would not result in a substantial increase in the size of the tower structure and is excluded from Section 106 Review (NHPA) under the definitions set forth in the Collocation Agreement. The proposed operation therefore will conform with the requirements of Section 1.1307(a)(4) of the Rules.

This Exhibit demonstrates that the proposed daytime operation of KRAE will conform with the requirements of Section 1.1307(b) of the Rules and with the guidelines set forth in the Commission's "OET Bulletin 65 (Edition 97-01) (August 1997)" concerning exposure to radiofrequency radiation.

The proposed KRAE daytime transmitting facilities will operate on 1480 kHz with 1.0 kW power. Nighttime operation of KRAE will be on a secondary basis, at a power level similar to the station's present nighttime operation at 0.065 kW power. Station KFBC operates on 1240 kHz with 0.70 kW power during daytime and nighttime hours.

EXHIBIT 18 (continued)

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Located adjacent to a public road and a park, the proposed KRAE transmitter site may be considered accessible by the general public. The base of the existing Laramie County tower is presently enclosed by a chain link fence, 1.8 meters high, with a locked gate. To restrict access to areas where excessive levels of radiofrequency radiation may be encountered for the diplexed operation of KRAE and KFBC, the fence will be altered so that the minimum distance between any part of the folded unipole skirt wires and the fence will be at least 2.0 meters. An RF hazard warning sign will be posted at the gate in the fence.

Evaluation of radiofrequency radiation levels at the proposed KRAE transmitter site, outside the fence that encloses the antenna tower structure, has been based upon the Maximum Permissible Exposure values established for uncontrolled exposure situations.

For the diplexed operation of stations KRAE and KFBC, with each station operating with 1.0 kW power, the power density levels were evaluated in accordance with the procedures described in Section 1, AM Radio Stations, of Supplement A (Edition 97-01) to the Commission's "OET Bulletin 65 (Edition 97-01) (August 1997)," using the curves of Figures 2 and 3 of Supplement A. Computations show that the contribution of KRAE to the total power density level would not exceed 6 percent of the Maximum Permissible Exposure value of 82.2 mW/cm² for uncontrolled exposure situations for operation on 1480 kHz; and that the contribution of KFBC to the total power density level would not exceed 6 percent of the Maximum Permissible Exposure value of 100 mW/cm² for controlled or uncontrolled exposure situations for operation on 1240 kHz; at any point outside the fence around the antenna tower.

Because of the relatively low power involved and the heights of the antennas above ground, the communications facilities that utilize the existing Laramie County tower structure were omitted from further consideration in this Exhibit.

Summing the percentages of the Maximum Permissible Exposure levels at the respective frequencies, the contributions from the diplexed operation of KRAE and KFBC would reach a total of 12 percent, or significantly less than the allowable total of 100 percent, at any locations outside the fence around the antenna tower. It therefore may be concluded that the diplexed operation of KRAE and KFBC at the KFBC transmitter site will not result in exposure of the general public to excessive levels of radiofrequency radiation.

EXHIBIT 18 (continued)

Compliance With Environmental Rules

The RF hazard warning sign at the gate in the fence around the antenna tower will alert workers that excessive radiofrequency radiation levels may be encountered inside the fence and on the tower structure. In any instance where it becomes necessary for workers to climb the tower, or to remain for extended periods in areas where radiofrequency radiation levels may exceed the allowable values, KRAE will operate at reduced power, or cease operation entirely, and will cooperate fully with KFBC and the other users of the transmitter site, as may be required to protect all workers from exposure to hazardous levels of radiofrequency radiation.

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