

Exhibit 35 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Community Media Group, LLC
WVMP(FM) Vinton, Virginia Ch. 268A 1.2 kW(DA) 198 m

Community Media Group, LLC (“*CMG*”) is the licensee of WVMP(FM) (Ch. 268A, Vinton, VA). *CMG* herein proposes to relocate WVMP(FM) to an existing tower at 58.2 meters above ground with a proposed effective radiated power (“ERP”) of 1.2 kW.

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. Because no change in structure height is proposed, 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 Radiation

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 meets 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.

The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 for Channel 268 (101.5 MHz) is 200 $\mu\text{W}/\text{cm}^2$. *CMG* is proposing to use a custom directional antenna mounted 58.2 meters above ground level with an ERP of 1.2 kW circularly polarized.

For the purpose of this study, “public access” will be considered at the base of the tower at a location two-meters above ground. The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET 65.

Exhibit 35 - Statement B – Environmental Considerations

(Page 2 of 3)

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

Where:

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

Using the above formula, with a vertical plane relative field of 0.52 between -60 and -90 degrees¹, it is estimated that the proposed facility would contribute a worst-case RF power density of 6.9 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near the antenna support structure, or 3.5 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

W04AG-D

A 6 Watt Digital Low Power Television Station (W04AG-D, Garden City Etc, VA, Facility ID 71327) is also located on the same structure at a mounting height of 61 meters above Ground Level. Based on information supplied in its FCC Application, (FCC File BDFCDTV-20100923AFW) the licensee of W04AG estimates that the contribution to the General Population Exposure Limit is on the order of 0.03%. Therefore, the calculated RF exposure from the proposed facility does not exceed the “uncontrolled/general population” MPE limit.

The Radio Frequency Energy contributions of the proposed WVMP(FM) (3.5%) and the existing, estimated contributions W04AG-D (0.03%) collectively fall far below the threshold for RF levels for members of the general public. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

¹ Based on information supplied by the intended antenna manufacturer.

Exhibit 35 - Statement B – Environmental Considerations

(Page 3 of 3)

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, 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 through the use of a locked fence. Additionally, 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 on the tower 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 exceed the guidelines, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise 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 §1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.