

Exhibit 22

Environmental Issues

1.) Sensitive Areas and Surface Features

The proposed station is located on an existing tower at an established communications site on a butte well away from any towns. This site is not within the boundaries of any designated wilderness area, wildlife preserve, or historic landmark. It is therefore not of environmental significance as defined by the Commission in CFR §1.1307(a)(1-7).

2.) New High Intensity Lighting in Residential Areas

The proposed station will involve a tower which may be required by the FAA to employ high intensity strobe lighting. It is however, not new and not in a residential area. It is therefore not of environmental significance as defined by the Commission in CFR §1.1307(a)(8).

3.) Radiation Hazard Analysis

Appendix C of OST Bulletin No. 65 (second edition) specifies the maximum radiation in the 30 MHz to 300 MHz region should be limited to $1000 \mu\text{w}/\text{cm}^2$ for occupational/controlled exposure and $200 \mu\text{w}/\text{cm}^2$ for general population/uncontrolled exposure. The instant application was evaluated with a modified version of the Commission's FMMODEL program, acquired from the FCC Office of Engineering and Technology Internet site.

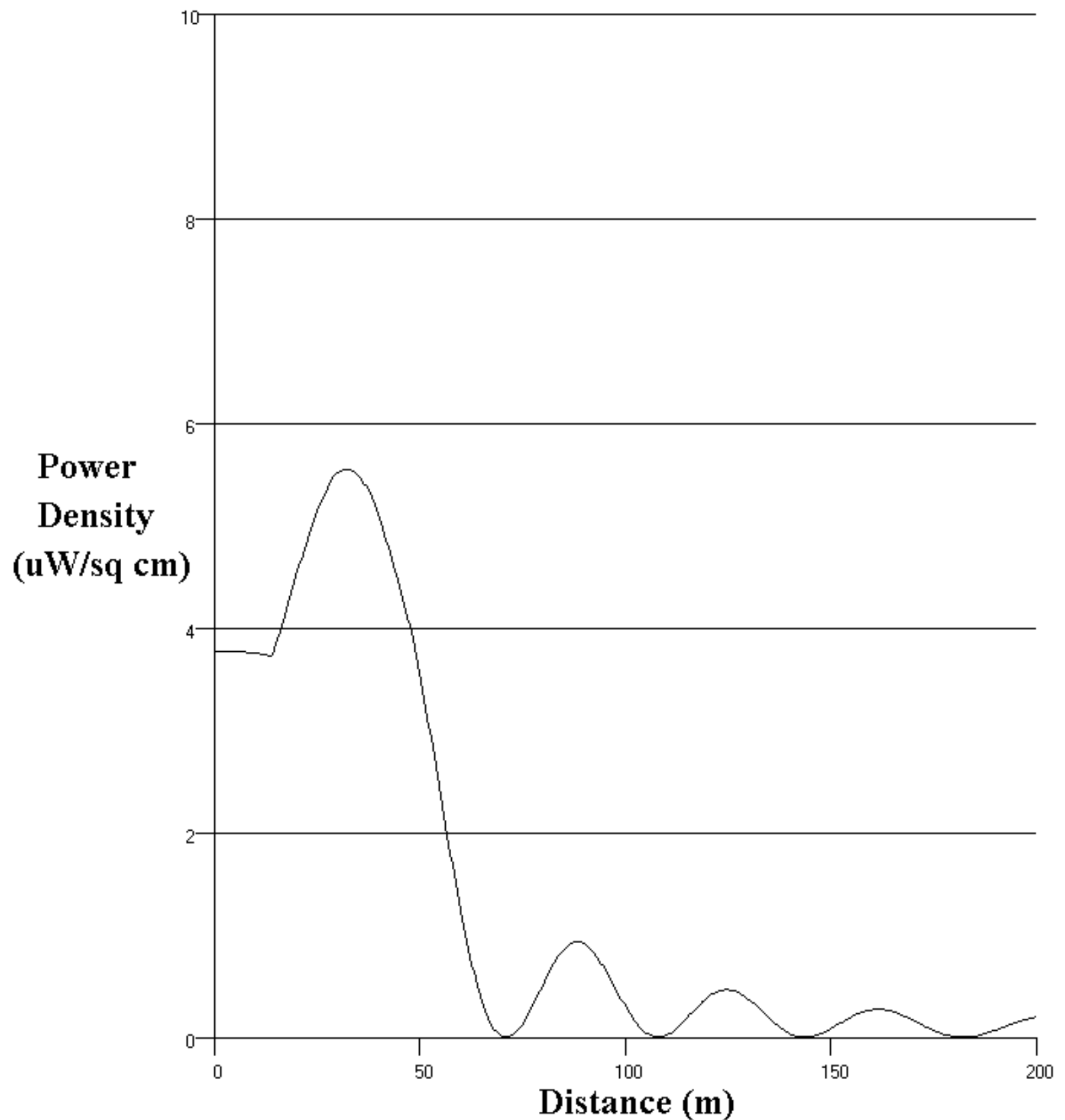
This application is for 100 kW ERP vertically polarized ERP at 165 meters above ground level. The antenna chosen is a twelve bay vertically polarized full wave spaced directional antenna. An identical facility is concurrently proposed. The program reports that the peak value of the power density for the combined facility (200 kW V) is $5.5421 \mu\text{w}/\text{cm}^2$ at 32.4 meters from the tower. This is 0.6 % of the maximum allowable occupational exposure level and 2.8 % of the allowable uncontrolled exposure level.

Because both these numbers can be considered negligible, given the presence of a television station on the same tower.

Unless personnel are actually climbing the tower, the radiation level is safe for occupational workers when the station is operating at full power. In the event of work on the tower, the transmitter power of any transmitter causing exposure in excess of the limits will be reduced to the extent required, (and possibly shut down, if necessary,) to allow safe work in the immediate region of the antennas. Proper signs will be posted to warn of the potential for exposure to radiofrequency fields.

This site is therefore not of environmental significance as defined by the Commission in CFR §1.1307(b).

Power Density vs Distance



Modified from FMMODEL, a program written by the FCC Office of Engineering and Technology

Distance(m):	<input type="text" value="200"/>	Antenna Type:	<input type="text" value="ERI or JAMPRO JBCP 'Rototiller' (EPA)"/>	KAWZ/KEFX
Horizontal ERP(kW):	<input type="text" value="0"/>	Number of Elements:	<input type="text" value="12"/>	5.54261 $\mu\text{W}/\text{sq cm}$
Vertical ERP(kW):	<input type="text" value="100"/>	Element Spacing:	<input type="text" value="1"/>	at 32.4 Meters
Antenna Height (m):	<input type="text" value="165.0"/>	0.6% of Occupational Limit 2.8% of General Limit		