

Exhibit 49 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
WBAL Hearst Television Inc.
WBAL-TV Baltimore, Maryland
Facility ID 65696
Ch. 11 (Auxiliary Antenna) 12.6 kW 286 m

WBAL Hearst Television Inc. (“WBAL”), licensee of analog television station WBAL-TV (Ch. 11, Baltimore, MD),¹ herein requests a Construction Permit seeking authorization to employ the station’s pre-transition, NTSC auxiliary antenna² for use as a DTV auxiliary antenna. No actual construction is proposed.

The auxiliary antenna is located on the same tower as the currently authorized facility.³ 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. Since no change in overall structure height is proposed, no change in current structure marking and lighting requirements is anticipated.

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.

The proposed WBAL-TV auxiliary antenna, a Dielectric model TF-4AH, has a center of radiation 273 meters above ground level and an ERP of 12.6 kilowatts, horizontally polarized. The model TF-4AH is a commonly used VHF antenna of the “batwing” type. OET 65 indicates that antennas of this type typically have a relative field value of 20 percent at elevation angles in downward

¹ See BLCDDT-20111102ACP.

² See BXLCT-20020628ACD.

³ See Antenna Structure Registration Number 1035558.

Exhibit 49 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(Page 2 of 3)

directions.⁴ However, for purposes of this calculation, a very conservative relative field value of 100 percent relative field was used. The “uncontrolled/general population” limit specified in §1.1310 for Channel 11 (center frequency 201 MHz) is 200 µW/cm².

OET 65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV 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 ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 5.7 µW/cm² at two meters above ground level near antenna support structure, or 2.9 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the actual RF power density is believed to be even lower due to the actual antenna elevation pattern and increased distance.

§1.1307(b)(3) states that facilities at locations with multiple transmitters 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 the any other facilities using 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 or near ground level as defined under §1.1307(b).

⁴ See Footnote 8, Page 29 Supplement A Edition 97-01 to OET Bulletin 65 Edition 97-01, August 1997

Exhibit 49 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(Page 3 of 3)

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused 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 continue to be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will continue to 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 continue to 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. According to information provided by the applicant, such protective measures include, but are 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 would otherwise be exceeded. On-site RF exposure measurements have also been undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations operating from or in the immediate vicinity of the WBAL-TV tower.

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.