

Exhibit 37 – Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Hawaii Public Television Foundation
KHET(TV) Honolulu, Hawaii
Facility ID: 26431
Ch. 11 28.7 kW (MAX-DA) 625 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

Hawaii Public Television Foundation ("*HPTF*") herein proposes to operate its post-transition Channel 11 digital operation for KHET(TV) from an existing tower (see Antenna Structure Registration Number 1007114). 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.

Human Exposure to Radiofrequency Radiation

HPTF will commission RF exposure measurements (and/or detailed calculations) to evaluate the level of RF exposure resulting from the proposed KTSF facility. As necessary, based on these results and considering all emitters, appropriate exposure abatement procedures will be established and followed, in order to comply with the Commission's exposure limits. Such abatement procedures may involve the restriction of access to certain areas and/or facility modifications to reduce RF levels.

Considering the post-construction measurement and an appropriate abatement program, the general public will not be exposed to RF levels in excess of the Commission's guidelines. RF exposure warning signs will continue to be posted.

Safety of Tower Workers and the General Public

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

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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 measurement program, 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. 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.