

Exhibit 35 – Engineering Statement

***CBS Radio WLIF, Inc.***

WLIF(FM)(Aux) Baltimore, Maryland

Facility ID 28637

Ch. 270B 2.7 kW 296 m

*CBS Radio WLIF, Inc. (“CBS Radio”)* seeks to modify the auxiliary antenna for WLIF(FM) Baltimore, Maryland. This Statement addresses the allocations and environmental factors related to this proposal.

The licensed WLIF(FM) auxiliary antenna is supported atop a candelabra tower in the *Television Hill* neighborhood of Baltimore, MD<sup>1</sup> along with three television station antennas that must be replaced as part of the forthcoming DTV transition. The existing WLIF panel antenna<sup>2</sup> is now affixed to structural steel that is slated for replacement. In the new configuration, an opportunity exists to slightly increase the antenna height above the candelabra.

The proposed antenna will be located 296 meters above average terrain (HAAT) and operate with an effective radiated power (ERP) of 2.7 kW. The 1 mV/m coverage contours of the licensed main and proposed auxiliary facilities are provided in Figure 1. As shown, the proposed contour does not extend beyond that of the licensed main facility. Contour locations were determined using technical parameters from the FCC’s CDBS engineering database, 360-radial elevation data from the USGS 3-arc second terrain database, and a software simulation of the FCC TVFMFS propagation curves.

The WWMX site is well beyond the coordination distances of Canada and Mexico. The nearest FCC monitoring station is 23.9 km at Laurel, Maryland. With no change in coordinates and only a slight change in ERP, coordination with the monitoring station is believed unnecessary. There are no AM stations within 3.2 km of the proposed facility.

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<sup>1</sup> See FCC Antenna Structure Registration Number 1035558, which supports the antennas of WBAL-TV, WMAR-TV, WJZ-TV, and WIYY(FM), all Baltimore, MD. WJZ-TV is licensed to commonly-owned CBS Television Licensees LLC.

<sup>2</sup> The WLIF auxiliary antenna also serves as the main antenna for WWMX (Baltimore, MD see BPH-20170915AAY) and the auxiliary antenna for WJZ-FM (Catonsville, MD).

Exhibit 35 – Engineering Statement  
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The proposed operation was evaluated for radiofrequency exposure using the FCC Office of Engineering and Technology's updated *FMMModel* software<sup>3</sup> which calculates RF power density at ground level given the height, power, and type of FM broadcast antenna. As demonstrated in the following, the proposed transmitting system complies with the FCC's general population/uncontrolled maximum permitted exposure (MPE) exposure guideline of 200  $\mu\text{W}/\text{cm}^2$  for the FM broadcast band.

An Electronics Research Inc., two-bay, 0.52 wavelength-spaced panel antenna is proposed for WLIF.<sup>4</sup> Using this antenna type and WLIF's proposed parameters as input values, *FMMModel* predicts a maximum, ground-level power density of 0.25  $\mu\text{W}/\text{cm}^2$  or 0.125 percent of the MPE; well less than the FCC limit.

According to §1.1307(b)(3), facilities at locations with multiple emitters are categorically excluded from responsibility for taking corrective action in areas where their contribution is less than five percent of the MPE limit. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities may be considered independently from this proposal. Thus, the impact of the proposed operation should not be considered to be a factor at ground level locations.

Tower access will continue to be controlled and appropriate RF exposure warning signs will continue to be posted. A site exposure policy is in effect that includes restriction of access, power reduction, or the complete shutdown of facilities when work must be performed where predicted RF levels would otherwise exceed appropriate guidelines. 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.

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<sup>3</sup> See FCC Public Notice DA 16-340, Released March 31, 2016.

<sup>4</sup> This was studied an EPA "Type 1 – Other" antenna.

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Considering the preceding, it is believed that the proposed facility satisfies all of the pertinent Commission rules and policies now in effect regarding allocation and environmental matters.

