Exhibit 29 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

Jefferson-Pilot Communications Company of North Carolina

WBT-FM Chester, South Carolina

Facility Id 10764

Ch. 257C3 7.7 kW 182 m

Nature of The Proposal

Jefferson-Pilot Communications Company of North Carolina ("*Jefferson-Pilot"*), licensee of WBT-FM Chester, South Carolina, herein proposes to correct station parameters based on a recent site survey. This application seeks to correct the site coordinates, the antenna height above mean sea level as a consequence of the site survey. The antenna height above average terrain ("HAAT") has changed resulting in a slight increase in the station effective radiated power (ERP). No actual construction is proposed. There will be no physical change in the actual transmitter site, or radiation center of antenna above ground level. The ERP is merely being adjusted to provide equivalent coverage of the currently licensed facility.

Since no new construction is involved at this existing tower site, it is believed that the provisions of Section 1.1307(a)(1-7) of the FCC Rules do not apply. High intensity white lighting is not employed. No change in the existing tower structure height is proposed. Communication antennas formerly mounted above the top mounted medium intensity strobe light have been relocated to a lower level on the tower, thus the change in the FAA authorized tower height. Further, on file FAA data has been updated based on the recent site survey. The FCC Antenna Structure Registration Number 1049484 has been updated to reflect the updated FAA *Determination Of No Hazard*. 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 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 existing WBT-FM transmitting antenna is installed such that its center of radiation is 143 meters above ground level. A maximum ERP of 7.7 kilowatts, circularly polarized, will be employed. Based on information provided by the antenna manufacturer, the existing Shively, Model 6813, full wave spaced 3 bay antenna has a maximum vertical plane relative field value less than 40 percent between 30° and 90° below the horizontal plane (i.e., below the antenna). Thus, a value of 40 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for FM radio frequencies is 200 $\mu W/cm^2$.

Using formula 10 from *OET 65*, the proposed facility would contribute a power density of 4.1 $\mu W/cm^2$ at two meters above ground level near antenna support structure. This is 2.05 percent of the general population/uncontrolled limit. At ground level locations farther away from the base of the support structure, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit 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 any other facilities near 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).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy 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 by the site owner. An existing fence around the base of the tower will continue to be maintained to restrict access. 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 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.

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.