

Exhibit 32 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Nodaway Broadcasting Corporation**  
KNIM-FM(Aux) Maryville, Missouri  
Facility ID 48974  
Ch. 246C3 0.093 kW 42.5 m

**Nature of The Proposal**

*Nodaway Broadcasting Corporation* (“Nodaway”), licensee of radio station KNIM-FM (Ch. 246C3, Maryville, Missouri), herein seeks approval to construct an auxiliary antenna facility having an effective radiated power (“ERP”) of 0.093 kW (93 Watts) (circular polarization) and an antenna height above average terrain (“HAAT”) of 42.5 meters.

According to information provided by the applicant, the proposed non-directional antenna will be side-mounted on an existing structure, with no change in overall height. 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. Because the structure passes the FCC's TOWAIR program test and is less than 200 feet in height, there are no requirements for marking and lighting. 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**

In keeping with §1.1307(b) of the FCC's Rules, the proposed KNIM-FM operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined in the FCC's OET Bulletin No. 65 (“OET-65”). OET-65 describes a means of determining whether a facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present FCC policy, facilities may be presumed to comply with the limits specified in §1.1310 if they satisfy the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed KNIM-FM auxiliary antenna facility would comply with the cited adopted guidelines.

**KNIM-FM - Maximum Contribution at 2 meters Above Ground Level**

The proposed KNIM-FM auxiliary antenna system would be installed such that its center is 25.9 meters above ground. For the purpose of this study, “public access” will be considered

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the locations outside the locked fence. Calculated levels of human exposure to RF electromagnetic field attributable to KNIM-FM in publicly accessible areas are summarized as follows.

KNIM-FM would operate with an effective radiated power (“ERP”) of 0.093 kilowatts (93 Watts). According to information provided by a representative of *Nodaway*, KNIM-FM will employ a circularly polarized, one-bay antenna. For purposes of this study, a conservative value of 100 percent relative field was used for this calculation. The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 for 97.1 MHz is 200  $\mu\text{W}/\text{cm}^2$ .

The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

$S$  = power density in microwatts/cm<sup>2</sup>  
 $F$  = relative field factor  
 $ERP$  = total (average) ERP in Watts  
 $D$  = distance in meters

Using this formula and the assumptions above, the proposed KNIM-FM facility contributes a power density of 10.9  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure, or 5.5 percent of the general population/uncontrolled MPE limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

#### **Safety of Workers and the General Public**

As demonstrated herein, excessive levels of RF energy attributable to the proposed KNIM-FM auxiliary antenna are not caused at publicly accessible areas at ground level. Consequently, members of the general public will not be exposed to RF levels in excess of the

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FCC's guidelines. Nevertheless, site access will be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, a site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on or near the antenna structure 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 would otherwise 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 proposed auxiliary transmitter of KNIM-FM is in compliance with §1.1307(b).