Exhibit 36 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

East Tennessee Public Communications Corp.

WKOP-DT Knoxville, Tennessee

Facility ID 18267

Ch. 17 100 kW 551 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

East Tennessee Public Communications Corp. (*"ETPCC"*) herein seeks modification of the construction permit (BMPEDT-20011207ABE) which authorizes the construction of WKOP-DT, a new digital television ("DTV") station on Channel 17, paired with WKOP-TV analog Channel 15, Knoxville, Tennessee. Site related issues during the tower structure's construction required a change in the overall tower height above ground level only and, consequently, a change in the authorized antenna height above ground level. The tower and antenna height above mean sea level as authorized in BMPEDT-20011207ABE remain unchanged. The antenna height above ground level was increased by 7 meters (23 feet) as a result of the site issues. Hence, a re-evaluation of RF exposure levels is provided.

The WKOP-DT antenna will be top-mounted on an existing "common" antenna supporting structure (FCC Antenna Structure Registration number 1222895) currently authorized for other stations. 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. No change in overall structure height is proposed, thus no change in the current structure marking and lighting requirements are anticipated. 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.

ETPCC proposes to install the WKOP-DT antenna such that its center of radiation is 456.9 meters above ground level. An effective radiated power ("ERP") of 100 kilowatts, horizontally polarized, will be employed. According to the antenna manufacturer's data, the proposed WKOP-DT antenna will have a relative field of 21 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 21 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for Channel 17 (center frequency 491 MHz) is 327.3 $\mu W/cm^2$.

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 (9) in OET-65.

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

Where:

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

Using this formula, the proposed facility would contribute a power density of 0.71 $\mu W/cm^2$ at two meters above ground level near antenna support structure, or 0.22 percent of the general population/uncontrolled 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.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where its contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, it is believed that the impact of the proposed operation should not be considered to be a factor at 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 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, 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. *ETPCC* 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.