

Exhibit 29 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Infinity Broadcasting Operations, Inc.**  
WOGL-FM Philadelphia, Pennsylvania  
Facility ID 9622  
Ch. 251B 9.6 kW 338 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**

*Infinity Broadcasting Operations, Inc.* ("*Infinity*") is the licensee of WOGL-FM, Ch. 251B, Philadelphia, Pennsylvania. WOGL-FM must vacate its existing location to accommodate DTV implementation needs. With the instant application *Infinity* seeks authority to move to an adjacent tower. The move will change the coordinates of the station by one (1) second of latitude and four tenths of a second of longitude for a distance of less than 50 meters.

The proposed WOGL-FM facility will be situated on an antenna supporting structure bearing FCC Antenna Structure Registration Number 1231524. No change is proposed to the overall structure height of the tower to which WOGL-FM is moving, thus no change in current structure marking and lighting requirements is anticipated. 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. 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

*Prepared September 6, 2002 by Mark B. Peabody*

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that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The WOGL-FM antenna will be installed such that its center of radiation is 314 meters above ground level. An effective radiated power (“ERP”) of 9.6 kilowatts, circularly polarized, will be employed. According to elevation pattern data for the planned seven around, four panel level FM antenna array, the proposed antenna may have a relative field of less than 25 percent from 20 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 25 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for FM Broadcast stations is 200  $\mu\text{W}/\text{cm}^2$ .

OET-65’s formula for FM is essentially equation (10) in OET-65.

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

Where:

$S$	=	power density in microwatts/cm <sup>2</sup>
$ERP$	=	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 0.412  $\mu\text{W}/\text{cm}^2$  at locations two meters above ground level near the base of the antenna support structure or 0.21 percent of the general population/uncontrolled limit. At ground level locations away from the building, 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 its contribution is less than five percent. Since the instant

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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**

A site exposure policy will continue to be employed to protect the general public. The policy will also continue to address how to protect 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.

# ENGINEERING EXHIBIT

## Application for FM Radio Station Construction Permit

prepared for

**Infinity Broadcasting Operations, Inc.**  
WOGL-FM Philadelphia, Pennsylvania  
Facility ID 9622  
Ch. 251B 9.6 kW 338 m

### Table of Contents

FCC Form 301, Section III-B

#### Exhibit 24

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	Pertinent Protected and Interfering Contours for Proposed WOGL-FM	
Figure 1A	Detail View - Contour Protection WOGL-FM toward WTKU(FM)	
Table II	Pertinent WOGL-FM Distance to Contour Data	
Table III	Summary Allocations History	
	(§73.213 Pre-1964 Spacing Grandfathering Calculations)	

#### Exhibit 29

Statement B	Environmental Considerations
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*This material supplies a "hard copy" of the engineering portions of this application as entered September 6, 2002 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*

Prepared September 6, 2002 by Mark B. Peabody

**Cavell, Mertz & Davis, Inc.**

<b>Section III-B - FM Engineering</b>																																																																																																											
<b>TECHNICAL SPECIFICATIONS</b>																																																																																																											
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.																																																																																																											
<b>TECH BOX</b>																																																																																																											
1.	Channel Number: 251																																																																																																										
2.	Class (select one): <input type="radio"/> A <input type="radio"/> B1 <input checked="" type="radio"/> B <input type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C <input type="radio"/> D																																																																																																										
3.	Antenna Location Coordinates: (NAD 27)  Latitude: Degrees 40 Minutes 2 Seconds 29.6 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 75 Minutes 14 Seconds 11.4 <input checked="" type="radio"/> West <input type="radio"/> East																																																																																																										
4.	One Step Proposal Allotment Coordinates: (NAD 27) <input checked="" type="checkbox"/> Not Applicable  Latitude: Degrees Minutes Seconds <input type="radio"/> North <input type="radio"/> South  Longitude: Degrees Minutes Seconds <input type="radio"/> West <input type="radio"/> East																																																																																																										
5.	Antenna Structure Registration Number: 1231524 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA																																																																																																										
6.	Overall Tower Height Above Ground Level:								383.1meters																																																																																																		
7.	Height of Radiation Center Above Mean Sea Level:								403 meters(H)		403 meters(V)																																																																																																
8.	Height of Radiation Center Above Ground Level:								314meters(H)		314meters(V)																																																																																																
9.	Height of Radiation Center Above Average Terrain:								338meters(H)		338meters(V)																																																																																																
10.	Effective Radiated Power:								9.6 kW(H)		9.6 kW(V)																																																																																																
11.	Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable (Beam-Tilt Antenna ONLY)								kW(H)		kW(V)																																																																																																
12.	Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional)  Rotation (Degrees): <input type="checkbox"/> No Rotation																																																																																																										
<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th></tr> </thead> <tbody> <tr><td>0</td><td></td><td>10</td><td></td><td>20</td><td></td><td>30</td><td></td><td>40</td><td></td><td>50</td><td></td></tr> <tr><td>60</td><td></td><td>70</td><td></td><td>80</td><td></td><td>90</td><td></td><td>100</td><td></td><td>110</td><td></td></tr> <tr><td>120</td><td></td><td>130</td><td></td><td>140</td><td></td><td>150</td><td></td><td>160</td><td></td><td>170</td><td></td></tr> <tr><td>180</td><td></td><td>190</td><td></td><td>200</td><td></td><td>210</td><td></td><td>220</td><td></td><td>230</td><td></td></tr> <tr><td>240</td><td></td><td>250</td><td></td><td>260</td><td></td><td>270</td><td></td><td>280</td><td></td><td>290</td><td></td></tr> <tr><td>300</td><td></td><td>310</td><td></td><td>320</td><td></td><td>330</td><td></td><td>340</td><td></td><td>350</td><td></td></tr> <tr> <td colspan="2">Additional Azimuths</td><td colspan="10"></td></tr> </tbody> </table>												Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0		10		20		30		40		50		60		70		80		90		100		110		120		130		140		150		160		170		180		190		200		210		220		230		240		250		260		270		280		290		300		310		320		330		340		350		Additional Azimuths											
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**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

#### CERTIFICATION

**AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.**

13.	<b>Allotment.</b> The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	<input checked="" type="radio"/> Yes <input type="radio"/> No
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		See Explanation in [Exhibit 21]
14.	<b>Community Coverage.</b> The proposed facility complies with 47 C.F.R. Section 73.315.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 22]
15.	<b>Main Studio Location.</b> The proposed main studio location complies with 47 C.F.R. Section 73.1125.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 23]
16.	<b>Interference.</b> The proposed facility complies with all of the following applicable rule sections: Check all those that apply:  <b>Separation Requirements.</b> <input checked="" type="checkbox"/> a) 47 C.F.R. Section 73.207  <b>Grandfathered Short-Spaced.</b>  <input checked="" type="checkbox"/> b) 47 C.F.R. Section 73.213(a) with respect to station(s): [Exhibit 25] <b>Exhibit required</b> <input type="checkbox"/> c) 47 C.F.R. Section 73.213(b) with respect to station(s): [Exhibit 26] <b>Exhibit required</b> <input checked="" type="checkbox"/> d) 47 C.F.R. Section 73.213(c) with respect to station(s): [Exhibit 27] <b>Exhibit required.</b>  <b>Contour Protection</b>  <input type="checkbox"/> e) 47 C.F.R. Section 73.215 with respect to station(s): [Exhibit 28] <b>Exhibit required.</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 24]
17.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b>  By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 29]
<b>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</b>		

### SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MARK B. PEABODY	Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature	Date 9/6/2002	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVE.		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20109 -

Telephone Number (include area code)  
7033929090

E-Mail Address (if available)  
MPEABODY@CMDCONSULTING.COM

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

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**Exhibits****Exhibit 24**

**Description:** EXHIBIT 24 - NATURE OF PROPOSAL & ALLOCATIONS CONSIDERATIONS

ATTACHED AS EXHIBIT 24 ALLOCATIONS CONSIDERATIONS - (WOGL-FM IS BEING DISPLACED FROM IT'S PRESENT LOCATION DUE TO DTV ANTENNA SPACE NEEDS OF THE TOWER OWNER.)

**Attachment 24**

Description	Type	Conversion	
		Status	File
<a href="#">Exhibit 24 - Nature of Proposal &amp; Allocations Considerations</a>	Adobe Acrobat File	not needed	PDF

**Exhibit 25**

**Description:** SEE EXHIBIT 24 - ALLOCATIONS CONSIDERATIONS

SEE EXHIBIT 24 - ALLOCATIONS CONSIDERATIONS

**Attachment 25****Attachment 26****Exhibit 27**

**Description:** SEE EXHIBIT 24 - ALLOCATIONS CONSIDERATIONS

SEE EXHIBIT 24 - ALLOCATIONS CONSIDERATIONS

**Attachment 27****Attachment 28****Exhibit 29**

**Description:** EXHIBIT 29 - ENVIRONMENTAL CONSIDERATIONS

ATTACHED AS EXHIBIT 29

**Attachment 29**

Description	Type	Conversion	
		Status	File
<a href="#">Exhibit 29 - Environmental Considerations</a>	Adobe Acrobat File	not needed	PDF