

Exhibit 8 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**LP Nyack Limited Partnership**  
WRNN-LP(CA) Nyack, New York  
Facility ID 38945  
Ch. 20+ 2.5 kW

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**

*LP Nyack Limited Partnership ("LNLP")* is the licensee of WRNN-LP Channel 35, Nyack, New York (file number BLTTA-20010601AFV). *LNLP* herein proposes to modify WRNN-LP to change from Channel 35 with an ERP of 0.8 kW to Channel 20 with an ERP of 2.5 kW while using the same directional antenna pattern and mounting location on an existing support structure with no increase in overall height.

The proposed WRNN-LP antenna system will be mounted on an authorized antenna supporting structure, having no FCC Antenna Structure Registration number as none is believed to be required due to the minimal overall height above ground level (38 meters). No change in overall height of this authorized structure will be necessary for the WRNN-LP antenna system. Note 1 of §1.1306 of the FCC rules indicates that the provisions of §1.1307(a) do not encompass the mounting of antennas on an existing antenna support structure unless the proposed use would affect a district, site, building, structure or object significant in American history or eligible for listing in the National Register of Historic Places. Based on information supplied by the applicant, it is believed that this does not apply to the relatively new tower on which *LNLP* has currently located WRNN-LP. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the FCC Rules.

Exhibit 8 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
(page 2 of 4)

### **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 WRNN-LP antenna will be installed such that its center of radiation is 28 meters above ground level. An effective radiated power ("ERP") of 2.5 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer, the proposed KTBU antenna will have a relative field of 16 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 16 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for Channel 20 (center frequency 509 MHZ) is 339.3 µW/cm<sup>2</sup>.

Using formula 2 from OET 65, Supplement A, (assuming typical 10 percent aural carrier level), the formula for NTSC television transmitting antennas as used for calculating signal density in this analysis is:

$$S(\mu W/cm^2) = \frac{(33.4098 \times F^2 \times [(0.4 \times ERP_{Visual}) + ERP_{Aural}])}{R^2}$$

Where:

<b>S</b>	=	Plane Wave Power Density (µW/cm <sup>2</sup> ) at specified point
<b>F</b>	=	Relative Field Factor for Horizontal and Vertical Planes
<b>ERP<sub>Visual</sub></b>	=	total visual ERP in Watts

Exhibit 8 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
(page 3 of 4)

$ERP_{Aural}$  = total aural ERP in Watts  
 $R$  = distance in meters from center of radiation to the specified point.

Using this formula, the proposed facility would contribute a power density of 1.58  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure, or 0.47 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 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 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

Exhibit 8 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**

(page 4 of 4)

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.