Exhibit 37 – Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

West Central Minnesota Educational Television Company

KSMN(DT) Worthington, Minnesota

Facility ID: 71558

Ch. 15 1000 kW 290.1 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

West Central Minnesota Educational Television Company (*"WCMETC"*) herein proposes to operate its post-transition Channel 15 digital operation for KSMN(TV) from an existing tower (see Antenna Structure Registration Number 1003305). 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. Since no change in overall structure height is proposed, no change in current structure marking and lighting requirements is anticipated.

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 proposed KSMN(TV) antenna that will be employed for the proposed post-transition operation will have a center of radiation 253 meters above ground level. An ERP of 1000 kilowatts, horizontally polarized, will be employed. Based on information provided by the antenna manufacturer, the antenna has a maximum vertical plane (elevation) relative field of 15 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 15 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for Channel 15 (center frequency 479 MHz) is 319.3 $\mu W/cm^2$.

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 (10) 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 11.93 μW/cm^2 at two meters above ground level near antenna support structure, or 3.7 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 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 the any other facilities using 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 attributable to the proposal 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 through the use of a locked fence. 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 continue to 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. 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.