

Exhibit 29 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Rey-Cel Broadcasting, Inc.
KPMW(FM) Haliimaile, Hawaii
Facility ID 56069
Ch. 288C3 14 kW 134.4 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

Rey-Cel Broadcasting, Inc. ("*Rey-Cel*") herein seeks a Construction Permit ("CP") to modify the existing license for KPMW(FM), Haliimaile, Hawaii, Channel 288A (file number BLH-19940802KC). The proposed directional FM antenna will be mounted on an existing antenna support structure at a new location (a developed communications site formerly employed by KONI(FM)), and at a higher effective radiated power ("ERP"). The proposed site has an existing antenna support structure which has been abandoned by another radio station. The instant proposal would extend the overall height of the antenna structure by three meters to 15 meters above ground level. At this height, the antenna support structure does not require evaluation by the FAA, nor does it require FCC registration.¹

Based on information provided by the applicant, it is believed that the provisions of Section 1.1307(a)(1-8) would not apply in this case. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

¹The site passes the FCC's "TOWAIR" evaluation based on a 15 meter overall height, a site AMSL of 1225.3 meters, and coordinates of 20° 44' 20.5" N and 156° 18' 37.9" W.(NAD 83).

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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.

This site is located near the Kula Forest Reserve, the Kahikinui Forest Reserve, and the Haleakala National Park, all of which provide various trails for off-road vehicles and hiking. However, according to the applicant, access to the transmitter site is restricted. There is an existing fenced compound, which is considered a "controlled" area. Specifically, access to the proposed transmitter site compound is restricted with a fence, locked gates, and warning signs. Only authorized and trained personnel are permitted within the fenced area. For these reasons, the applicant considers the fenced area to be restricted, and the "controlled / occupational" exposure limits to RF electromagnetic field would apply in these locations. The "controlled / occupational" limit specified in §1.1310 for the FM radio band is 1000 $\mu\text{W}/\text{cm}^2$; the corresponding "uncontrolled / general population" limit is 200 $\mu\text{W}/\text{cm}^2$.

Rey-Cel proposes to install the KPMW(FM) transmitting antenna such that its center of radiation is 12 meters above ground level. A four-bay half-wave spaced directional antenna with a maximum effective radiated power ("ERP") of 14 kilowatts, circularly polarized, will be employed.

Calculations were made per OET 65 to predict power density attributable to the proposed facility at location points two meters above ground level in the immediate vicinity of the tower. The proposed directional (azimuth) pattern, and vertical (elevation) pattern for a 4-bay half-wave spaced antenna was used to calculate the exposure at several radials around the tower.

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The formula used for calculating FM signal density in this analysis is the same as equation (9) in OET-65.

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

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, calculations were made to predict power density at points two meters above ground level locations. Considering actual terrain elevations near the site and the directivity of the proposed antenna system in the horizontal and vertical planes, RF density levels attributable to the proposed KPMW(FM) facility will be less than 20 percent of the occupational / controlled Maximum Permissible Exposure (“MPE”) limit at ground level locations within the “controlled access” area. At ground level locations beyond the area restricted to the general public, RF density levels attributable to the proposed KPMW(FM) facility will be less than 90 percent of the general public / uncontrolled MPE.

Based on information provided by the site owners, KONI(FM), which has been licensed to this site, has removed its transmitter, and is no longer broadcasting from this location. A search of CDBS indicates that KONI has filed an FCC 302-FM to cover its’ CP to move to another site. There are no other transmitters at this site, and all other non-excluded emitters are more than 2 km distant. 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

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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 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 (or on nearby towers) 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.

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.