Exhibit 29 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

Citadel Broadcasting Company

WHWK(FM) Binghamton, Pennsylvania

Facility ID 72373

Ch. 251B 6.7 kW 395 m

Nature of The Proposal

Citadel Broadcasting Company ("Citadel"), licensee of WHWK(FM) Binghamton, Pennsylvania, herein proposes to change the WHWK transmitter location, effective radiated power, antenna directional pattern, and antenna height above average terrain. The transmitting antenna system will consist of a side-mounted, three bay, ½ wavelength spaced antenna at 268.8 meters above ground. A circularly polarized effective radiated power of 6.7 kilowatts will be employed.

Based on information provided by the applicant, it is believed that the site is not environmentally sensitive, nor does it fall under the provisions of Section 1.1307 of the FCC Rules. The proposed site is also a developed communications site and thus the proposed use is considered to be environmentally preferable.

Human Exposure to Radiofrequency Radiation

In keeping with §1.1307(b) of the Commission's Rules, the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines specified in §1.1310 of the Commission's Rules. Under present Commission policy, a facility may be presumed to comply with the limits in §1.1310 of the Commission's Rules 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.

Referencing the elevation pattern in the attached **Figure 4**, the proposed WBSX antenna will have a relative field of 0.15 or less from 60 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a relative field value of 0.15 is used for this calculation. Under these assumptions,

the proposed facility would contribute a power density of 0.14 $\mu W/cm^2$, or 0.07 percent of the "general population/uncontrolled" limit at 2 meters above ground level. The "general population uncontrolled" limit for 98.1 MHz is 200 $\mu W/cm^2$

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters (such as the case at hand), 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 various 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 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 continue to be restricted and controlled by the site owner. An existing fence around the base of the tower will continue to be maintained to restrict access. 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 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. *Citadel* 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.

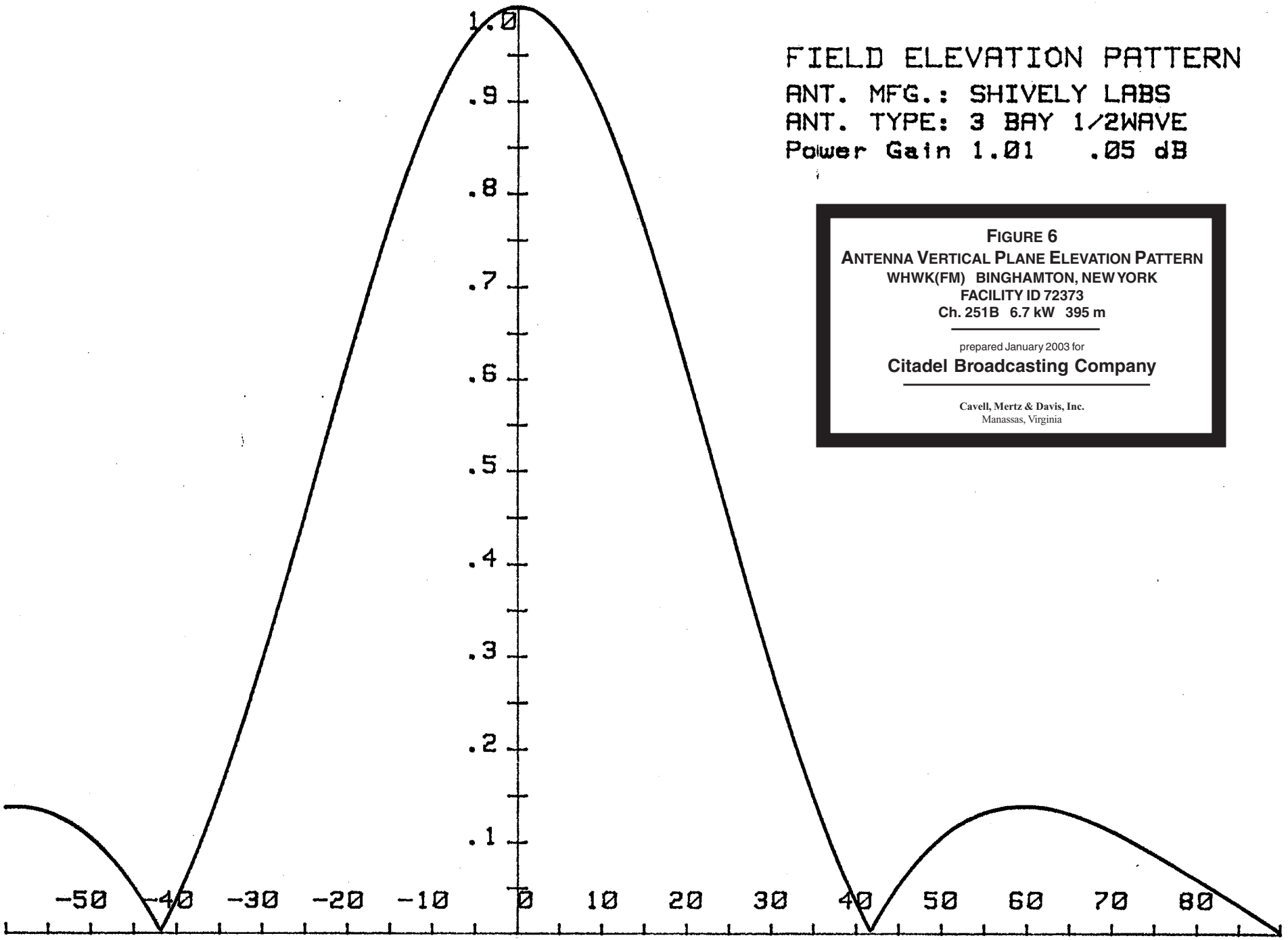

FIGURE 6
ANTENNA VERTICAL PLANE ELEVATION PATTERN
WHWK(FM) BINGHAMTON, NEW YORK
FACILITY ID 72373
Ch. 251B 6.7 kW 395 m

prepared January 2003 for

Citadel Broadcasting Company

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

ENGINEERING EXHIBIT

APPLICATION FOR CONSTRUCTION PERMIT

prepared for

Citadel Broadcasting Company

WHWK(FM) Binghamton, New York

Facility Id 72373

Ch. 251B 6.7 kW 395 m

Table of Contents

This material supplies a "hard copy" of the engineering portions of this application as entered February 6, 2003 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.

Section III-B - FM Engineering

TECHNICAL SPECIFICATIONS
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.

TECH BOX

1.	Channel Number: 251		
2.	Class (select one): ○ A ○ B1 ◉ B ○ C3 ○ C2 ○ C1 ○ C0 ○ C ○ D		
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 42 Minutes 3 Seconds 40 ◉ North ○ South Longitude: Degrees 75 Minutes 56 Seconds 45 ◉ West ○ East		
4.	One Step Proposal Allotment Coordinates: (NAD 27) ☑ Not Applicable Latitude: Degrees Minutes Seconds ○ North ○ South Longitude: Degrees Minutes Seconds ○ West ○ East		
5.	Antenna Structure Registration Number: 1236974 ☐ Not Applicable ☐ Notification filed with FAA		
6.	Overall Tower Height Above Ground Level:	288.6meters	
7.	Height of Radiation Center Above Mean Sea Level:	790 meters(H)	790 meters(V)
8.	Height of Radiation Center Above Ground Level:	268.8meters(H)	268.8meters(V)
9.	Height of Radiation Center Above Average Terrain:	395meters(H)	395meters(V)
10.	Effective Radiated Power:	6.7 kW(H)	6.7 kW(V)
11.	Maximum Effective Radiated Power: ☑ Not Applicable (Beam-Tilt Antenna ONLY)	kW(H)	kW(V)
12.	Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional) Rotation (Degrees): ☑ No Rotation		

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	1	10	1	20	1	30	1	40	1	50	1
60	1	70	1	80	1	90	1	100	1	110	1
120	0.91	130	0.8	140	0.68	150	0.57	160	0.51	170	0.45
180	0.4	190	0.45	200	0.51	210	0.57	220	0.68	230	0.8
240	0.91	250	1	260	1	270	1	280	1	290	1
300	1	310	1	320	1	330	1	340	1	350	1
Additional Azimuths											

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.	**Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	(•) Yes ( ) No See Explanation in [Exhibit 21]
14.	**Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315.	(•) Yes ( ) No See Explanation in [Exhibit 22]
15.	**Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125.	(•) Yes ( ) No See Explanation in [Exhibit 23]
16.	**Interference.** The proposed facility complies with all of the following applicable rule sections: Check all those that apply: **Separation Requirements.** ☑ a) 47 C.F.R. Section 73.207 **Grandfathered Short-Spaced.** ☑ b) 47 C.F.R. Section 73.213(a) with respect to station(s): [Exhibit 25] **Exhibit required** ☐ c) 47 C.F.R. Section 73.213(b) with respect to station(s): [Exhibit 26] **Exhibit required** ☐ d) 47 C.F.R. Section 73.213(c) with respect to station(s): [Exhibit 27] **Exhibit required.** **Contour Protection** ☐ e) 47 C.F.R. Section 73.215 with respect to station(s): [Exhibit 28] **Exhibit required.**	( ) Yes (•) No See Explanation in [Exhibit 24]
17.	**Environmental Protection Act.** 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 **Exhibit is required.** 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.	(•) Yes ( ) No See Explanation in [Exhibit 29]

PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

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 DANIEL G. RYSON		Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT
Signature		Date
Mailing Address 7839 ASHTON AVENUE		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20109 -2883
Telephone Number (include area code) 7033929090	E-Mail Address (if available) DRYSON@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).

Exhibits

Attachment 25

Description
Exhibit 25 - Statement A

Attachment 29

Description
Exhibit 29 - Statement B