

Exhibit 12

Radiofrequency Electromagnetic Field Exposure

The proposed DTV Channel 31 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." Assuming an effective radiated power of .3 KW and a relative field value of 0.5, the calculated maximum power density at a point 2 meters above the base of the tower is calculated to be 0.000013 milliwatts per square centimeter (mw/cm²), or 0.00 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.382 mw/cm² for Channel 31). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such exclusion in Section 1.1306.