

## **EXHIBIT 31**

### **KRTH(FM) FCC 301 Application**

CBS Radio East inc.. (herein CBS), the licensee of KRTH(FM), Los Angeles, CA proposes to install a new circularly polarized antenna, Dielectric model DCR-M3EFE75R, 16 kW average radiated power at 113.4 meters antenna radiation center height above ground.

An analysis has been made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition 97-01, prepared by the FCC Office of Engineering and Technology. This analysis was made at a reference point two meters above ground level moving out from the base of the antenna until the point of maximum exposure was located.

At this point of maximum exposure 137m, the calculated KRTH(FM) antenna power density is 2.256 microWatts/cm<sup>2</sup> which is 1.128% of the FCC MPE limit for general population/uncontrolled exposure, and 0.226 % of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of OET Bulletin 65, at multiple-user transmitter sites, only those licensees whose transmitters product power density levels in excess of 5.0% of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RF environment in compliance with FCC exposure limits. Since the KRTH(FM) operation will contribute less than 5.0% of the most restrictive permissible exposure at any location on the ground at the multiple-user site, KRTH(FM) is not considered a “significant contributor” to the local RF

exposure environment and contributions to exposure from other sources in the vicinity of KRTH(FM) were not taken into account in this analysis.

However, the KRTH(FM) antenna operation will be a “significant contributor” to exposure at locations on the supporting structure near the antenna when it is being operated. If work is done on the tower in an area where over exposure could occur, CBS will take necessary action to prevent the overexposure of workers on the tower including reducing the KRTH(FM) transmitting power or ceasing operation completely. In addition, CBS will cooperate with other site users to insure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The KRTH(FM) antenna facility will utilize an existing supporting structure that is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest
2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since no change in the existing lighting is proposed.
3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.