

EXHIBIT 43
ENVIRONMENTAL STUDY
STC LICENSE COMPANY
STATION WUPW-DT
TOLEDO, OHIO
CH 46 110 KW (MAX-DA, BT) 356 METERS

STC License Company (herein STC) proposes herein to operate the digital television (DTV) facilities of WUPW-DT, channel 46 (662 to 668 megahertz (MHz)), Toledo, Ohio at an existing transmitter site located at geographic coordinates 41° 39' 22" North Latitude, 83° 26' 41" West Longitude (referenced to 1927 North American Datum), using a horizontally polarized, directional antenna, 110 kilowatts (kW) maximum average effective radiated power (ERP), and 356 meters antenna radiation center height above average terrain. The proposed WUPW-DT antenna radiation center is 356 meters above ground level (AGL).

A fence restricts public access to the WUPW-DT antenna and supporting structure. There is no casual or inadvertent access to the WUPW-DT transmitter site by the general public.

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. A conservative vertical plane relative field factor of 0.1, obtained from the manufacturer's theoretical vertical plane radiation pattern for the WUPW-DT, Dielectric Communications, type TFU-24 DSC C170 DTV, transmitting antenna was used in the calculation of the WUPW-DT power density. The WUPW-DT maximum average ERP of 110 kW was used in the calculation of WUPW-DT power density. To account for ground reflections, a coefficient of 1.6 was included in the calculations. The WUPW-DT power density calculations reported herein were made at 662 MHz, the lower edge of the WUPW-DT channel.

The FCC maximum permissible exposure (MPE) limit for general population/uncontrolled exposure is 0.44 milliwatt per square centimeter (mW/cm^2) at 662 MHz. The FCC MPE limit for occupational/controlled exposure is $2.21 \text{ mW}/\text{cm}^2$ at 662 MHz. At a reference point two meters AGL at the base of the WUPW-DT supporting structure, the calculated WUPW-DT power density is $0.00029 \text{ mW}/\text{cm}^2$, which is 0.07 percent of the FCC MPE

limit for general population/uncontrolled exposure, and 0.01 percent of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of *OET Bulletin 65, Edition 97-01*, at multiple-user transmitter sites, only those licensees whose transmitters produce power density levels in excess of 5.0 percent of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RFR environment into compliance with FCC exposure limits. Since the WUPW-DT operation will contribute less than 5.0 percent of the most restrictive permissible exposure at any location on the ground at the multiple-user site, WUPW-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of WUPW-DT were not taken into account in this analysis.

While not a “significant contributor” to the exposure levels at any location on the ground, the WUPW-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WUPW-DT transmitting antenna. If work is done on the tower in an area

where overexposure could occur, STC will take action necessary to prevent the overexposure of workers on the tower, including reducing WUPW-DT transmitter power or ceasing WUPW-DT operation completely. Additionally, STC will cooperate with other site users to assure 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 WUPW-DT channel 46 DTV facility utilizes an existing supporting structure which 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 WUPW-DT proposes to use an existing supporting structure and no change in the existing obstruction lighting is proposed.

3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.

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