

Exhibit 30 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Liberman Broadcasting of Houston License Corp
KQQK(FM) Beaumont, Texas
Facility ID 19087
Ch. 300C 90 kW 596 m

Nature of The Proposal

Liberman Broadcasting of Houston License Corp. ("Liberman") is the licensee of KQQK(FM), Ch. 300C, Beaumont, Texas. *Liberman* seeks to relocate KQQK to a proposed new tower structure at a different site location.

Liberman commissioned a review of the various environmental subjects outlined in Section 1.1307(a)(1-8) of the Commission's Rules, which was performed by HBC Terracon of Houston, Texas. The HBC report (dated June 15, 2004) indicates that none of the triggering criteria of §1.1307(a)(1-8) apply to the proposal, except possibly for §1.1307(a)(7) in that "the site lies within a ... farmed area identified on the National Wetlands Inventory maps." It therefore recommended that a wetland delineation be performed by a qualified wetlands specialist. Accordingly, additional environmental analysis was performed that resulted in a "Jurisdictional Determination" being issued March 10, 2005 by the U. S. Department of the Army ("DA"), Galveston District, Corps of Engineers concluding that "there are not any waters of the U.S. (including adjacent wetlands) within the proposed project area" and "a DA permit is not required for the proposed project as submitted." Compliance with the Commission's radiofrequency exposure limits is discussed below. Therefore, the applicant believes that this application may be categorically excluded from environmental processing pursuant to Section 1.1306 of the FCC Rules.

Human Exposure to Radiofrequency Electromagnetic Field

The proposed operation was evaluated for human exposure to radiofrequency ("RF") electromagnetic field 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

Exhibit 30 - Statement B
ENVIRONMENTAL CONSIDERATIONS

(page 2 of 4)

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.

Lieberman proposes to install the KQQK transmitting antenna such that its center of radiation is 594.6 meters above ground level. An effective radiated power of 90 kilowatts, horizontally and vertically polarized, will be employed. A worst-case value of 100 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for the FM Broadcast service is 200 $\mu\text{W}/\text{cm}^2$. RF plane wave power density is predicted pursuant to OET Bulletin 65, equation (9):

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

Where:

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

Using this formula, the proposed facility would contribute an RF power density of 17.1 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near the antenna support structure, or 8.6 percent of the general population/uncontrolled limit.

According to the FCC's CDBS database, the nearest authorized FM stations¹ are located 4.25 km from the proposed KQQK. There are no authorized television or AM stations within 10 km. At these large distances, consideration of these other broadcast station emitters is not necessary.

In a separate application (BPH-20040427ABJ), *Lieberman* also proposes to relocate KTJM (Ch.253C, Port Arthur, TX) to the site proposed herein for KQQK and employ a “common” antenna

¹ Stations KQBU-FM (Ch. 227C, Port Arthur, TX), KTJM(FM) (Ch. 253C, Port Arthur, TX), KSHN(FM) (Ch. 260C2 Liberty, TX), and KKHT-FM, Ch. 264C, Winnie, TX) are co-located at a site 4.25 km from the proposed KQQK. The licensed KQQK facility is also co-located with these stations.

Exhibit 30 - Statement B
ENVIRONMENTAL CONSIDERATIONS

(page 3 of 4)

system at 100 kW ERP (horizontal and vertically polarized) with KQQK. Calculations show that on a worst-case basis, KTJM would contribute an RF power density of 19.0 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near the antenna support structure, or 9.5 percent of the general population/uncontrolled limit.

Summing the individual contributions from KQQK and KTJM, the total RF power density is 18.1 percent of the general population/uncontrolled limit. When the antenna's actual vertical (elevation) pattern is employed, the calculated RF power density near the ground is reduced significantly. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal 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 be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will 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. The applicant will coordinate exposure procedures with all pertinent stations.

Exhibit 30 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 4 of 4)

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.