

**TECHNICAL EXHIBIT 32**  
**ENVIRONMENTAL PROTECTION ACT**

**IN SUPPORT OF THE MINOR CHANGE APPLICATION**  
**WTCM-FM, TRAVERSE CITY, MICHIGAN**  
MAY 2009

Since the proposed WTCM-FM operation would be from an existing tower site, and involves replacement of the existing 997 foot tower with a 1,550 foot tower the environmental concerns listed in Section 1.1307(a) of the Commission's Rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 100 kW (H+V) and a radiation center of 453 meters above ground level, the proposed WTCM-FM operation would have a maximum of 8.2 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.5 in the downward direction. The Commission's guidelines for the FM band are 1,000  $\mu\text{W}/\text{cm}^2$  for the occupational/controlled, and 200  $\mu\text{W}/\text{cm}^2$  for the general population/uncontrolled environment.

The present WTCM-FM tower has a security fence around the tower and the proposed replacement tower will also have a security fence around the tower. The above analysis indicates that members of the public and personnel working around the proposed WTCM-FM operation would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station WTCM-FM will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.