Exhibit 35 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

Delmarva Broadcasting Company

WNCL(FM) Milford, Delaware

Ch. 267A 6 kW(Max-DA) 93.5 m

Delmarva Broadcasting Company ("DBC"), licensee of WNCL(FM)(Ch. 267A) Milford, Delaware,[3] herein proposes to replace the WNCL main antenna following replacement of the station tower.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. According to information provided by a representative of the applicant, this construction is exempt from historical review because the new tower is equivalent to the prior tower and will be located on the same parcel of land. Further, it is exempt from NEPA because it does not involve any sensitive sites. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy 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 meets 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 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.

An Electronics Research four-bay, one-wavelength spaced, circularly polarized "rototiller" type antenna is proposed, which will be installed 90.8 meters above ground level. According to information provided by the manufacturer, the antenna has an elevation pattern of 40% relative field or less at points 10 or more degrees below the horizon. Therefore a value of 40% relative field was used for this calculation. The general population/uncontrolled maximum permitted exposure ("MPE") limit specified in §1.1310 for Channel 267 (101.3 MHz) is 200 $\mu W/cm^2$.

[3] *See* FCC File BLH-19901119KH.

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For the purpose of this study, "public access" will be considered at the base of the tower at a location two-meters above ground. The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET 65.

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

Where:

S = power density in microwatts/cm^2
F = relative field factor
ERP = total (average) ERP in Watts
D = distance in meters

Using the above formula, it was determined that the proposed facility would contribute a RF power density of 8.1 μW/cm^2 at two meters above ground level near the antenna support structure, or 4.1 percent of the general population/uncontrolled limit. 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.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy will not be caused by the proposal 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.

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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 would otherwise 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.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.