

Exhibit 30 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Citadel Broadcasting Company
WEDG(FM)(Aux) Buffalo, New York
Facility ID 56103
Ch. 277B 7.2 kW 95 m

Nature of The Proposal

Citadel Broadcasting Company (“Citadel”), licensee of FM radio station WEDG(FM) (Ch. 277B, Buffalo, New York), herein seeks approval to construct an auxiliary antenna facility for the station having an effective radiated power (“ERP”) of 7.2 kW (circular polarization) and an antenna height above average terrain (“HAAT”) of 95 meters. The proposed non-directional antenna will be side-mounted on an existing structure (ASR 1012291) that also serves as the support structure for the main WEDG antenna (BLH-19970523KB) and WWWS(AM) 1440 kHz, Buffalo, NY (BL-19970820KE).

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. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. 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 Electromagnetic Field

In keeping with §1.1307(b) of the FCC’s Rules, the proposed WEDG and co-located WWWS operations have been evaluated for human exposure to radiofrequency energy using the procedures outlined in the FCC’s OET Bulletin No. 65 (“OET-65”). OET-65 describes a means of determining whether a facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present FCC policy, facilities may be presumed to comply with the limits specified in §1.1310 if they satisfy the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the common transmitter site of WEDG and WWWS would comply with the cited adopted guidelines.

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According to information provided by a representative of *Citadel*, access to the WEDG facility is limited by means of warning signs and a fence that is 152 meters from the antenna support structure at its nearest point. A second fence, located 15.2 meters from the base of the antenna support structure, further limits access to the base of the tower and the folded-unipole antenna that serves WWWS. For the purpose of this study, “public access” will be considered the locations outside the locked, inner fence.

WEDG Auxiliary Antenna - Maximum Contribution at 2 meters Above Ground Level

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 this formula and the assumptions above, the proposed WEDG facility contributes a power density of 75.2 µW/cm² at two meters above ground level near antenna support structure, or 37.6 percent of the general population/uncontrolled MPE 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. As the main WEDG antenna will never be operational when the auxiliary antenna is utilized (due to self-interference), its contribution is not considered in this analysis.

WWWS - Contribution to points outside the tower fence

According to its license, the WWWS transmitting antenna system consists of a radiator that is 172.6° or (at the authorized frequency of 1440 kHz) 0.479 wavelengths in height. The station is licensed to operate with a non-directional power of 1 kilowatt, day and night. As mentioned earlier, the tower and its antenna tuning unit are surrounded by a fence that extends at

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least 15.2 meters from the tower face. The fence is locked and appropriate RF exposure warning signs are posted. The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 for 1440 kHz is 572 mV/m electric field strength and 1.52 A/m magnetic field strength.

An interpolated result from Figure 2 of OET-65, Supplement A, was used for the analysis herein. The interpolated electric field and magnetic field along with the calculated percentage of the general population / uncontrolled MPE limit (when squared per the technique described in OET-65) is shown below.

<u>Power</u>	<u>Height</u>	<u>Distance</u>	<u>E Field</u>	<u>E Field MPE</u>	<u>H Field</u>	<u>H Field MPE</u>
(kW)	(deg)	(m)	(V/m)	(Percent)	(A/m)	(Percent)
1.0	172.6	15.2	11.466	0.04	0.012	0.01

Consideration of Both Facilities

The calculated percentage of the RF electromagnetic field MPE at the closest publicly accessible point near the tower base is summarized in the table below. As shown, considering both facilities, in no case will the human exposure to RF electromagnetic field exceed the uncontrolled / general population MPE limit specified in §1.1310. There are no other authorized AM, FM, or TV stations within 2 km of the proposed WEDG(FM) auxiliary transmitter site.

<u>Facility</u>	<u>Percentage of MPE</u>
WEDG(FM)	37.60%
WWWS(AM)	0.04%
Total percentage	37.64%

Safety of Workers and the General Public

As demonstrated herein, the proposed facility will not result in exposure of the general public to RF levels in excess of the FCC’s guidelines. Nevertheless, site access will continue to be restricted and controlled and RF exposure warning signs are posted.

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With respect to worker safety, a site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on or near the antenna structures 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. *Citadel* will continue to coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the proposed facility is in compliance with §1.1307(b).