

## EXHIBIT 22

ENVIRONMENTAL STATEMENT CONCERNING HUMAN  
EXPOSURE TO RADIO FREQUENCY RADIATION

for

CATHOLIC BROADCASTING NORTHWEST, INC.  
FM RADIO STATION KBVM

An Environmental Assessment (EA) is categorically excluded under 47 C.F.R. Section 1.1306(b) of the FCC Rules and Regulations since the Applicant's proposal does not:

1. Involve a site location specified under 47 C.F.R. Section 1.1307(a)(1) through (7).
2. Involve high intensity lighting under 47 C.F.R. Section 1.1307(a)(8).
3. Result in human exposure to radiofrequency radiation in excess of 1.0 percent of the applicable safety standards specified in 47 C.F.R. Section 1.1307(b), (ANSI C95.1-1982 and ANSI C95.1-1991).

The proposed FM operation is in a fenced and controlled "antenna farm" area. The antenna center of radiation is 205 meters above ground level and the surrounding areas slope downward from the KOIN TV tower. This is a multiple transmitter use area. The Maximum Permissible Exposure (MPE) for controlled environments at 88.3 MHz is 1000 uW/cm<sup>2</sup>. The MPE for uncontrolled exposure is 200 uW/cm<sup>2</sup>. The distance from the proposed FM antenna radiating a total of 7.0 kW (3.5 kW H and 3.5 kW V) ERP to any controlled or uncontrolled point at ground level is 205 meters or greater.

The predicted radio frequency power density at ground level, resulting from the Applicant's proposed operation, may be determined by the equation (10) on page 23 of the FCC OST Bulletin No. 65 dated August 1997. The relative field strength at depression angles between -40 and -90 degrees towards the ground for the Shively Labs Antenna Type 6014-3/3 three section FM antenna is less than 0.25 as plotted in the vertical plane relative field graph attached as Exhibit 22A. The maximum radio frequency power density at any point 2 meters above the ground in all surrounding controlled or uncontrolled areas is equal to or less than the following.

$$S \text{ uW/cm}^2 = \frac{(33.4)(0.25)^2(7000 \text{ watts})}{(203)^2}$$

$$S = 0.36 \text{ microwatts per square centimeter}$$

This total radiated power density at any ground level is less than 0.2 percent of the exposure limit applicable to this FM facility.

Therefore, the proposed installation does comply with FCC specified guidelines for uncontrolled human exposure to radio frequency radiation at ground levels near the existing tower.

The tower site area is fenced to prevent unauthorized access. The closest distance from the tower to this fence is 61 meters (200 feet).

The Applicant will instruct all personnel to terminate RF radiations from this antenna when service work requires that persons approach the proposed antenna at distances equal to or less than the MPE distance for controlled exposure.

The Applicant believes there will be no significant effect on the human environment regarding public exposure or occasional visits by technical personnel and that warning signs will be sufficient for proper notification of a potential hazard.

All site lease agreements for antenna and transmitter space at the KOIN TV tower farm site will contain conditions to require compliance with all FCC requirements for required protection of operating and technical service personnel from radio frequency radiations. The Applicant understands that interruptions to normal radio transmissions will be necessary when maintenance personnel must work in posted areas on the tower.