EXHIBIT 29
ENVIRONMENTAL STATEMENT
KKFR 97.7 KW 525 M HAAT CH. 222C
GLENDALE, ARIZONA

The applicant, Emmis Radio License Corporation, requests authority to change antenna location and increase antenna height for FM broadcast station KKFR, Channel 222C, Glendale, AZ, Facility ID No. 65479. Specifically, the proposal involves the co-location of KKFR and co-owned FM station KKLT, Channel 254C. Phoenix, AZ, Facility ID No. 52514. Stations KKFR and KKLT will shared a new broadband antenna system that will be mounted on the existing KKLT tower, ASR No. 1001097, located approximately 139 meters from the current KKFR facility.

The proposal will not have a significant effect on the quality of the human environment and does not require an environmental assessment. It is categorically excluded from environmental processing by Section 1.1306 of the Commission's rules since the specified antenna will be supported by an existing tower and the safety standards for human exposure to radio-frequency (RF) energy in Section 1.1307(b) will not be exceeded as described below.

The changes specified for KKFR will not result in RF contributions exceeding the *RF Radiation Exposure Limits* specified in Section 1.1310. The new antenna to be employed is an 8-bay, circularly polarized, ERI "rototiller" style antenna with full-wave spacing and -0.627° electrical beam tilt. Effective radiated power with beam tilt will be 100 kW and the antenna center of radiation will be positioned at 101 meters above ground level. The antenna site is on top of South Mountain at an established communications site where numerous primary and secondary FM and TV broadcast facilities are located. Access to this secluded mountain area is very limited and highly controlled using warning signs, tall fencing and locked gates. Since the antenna location is isolated from the

general population, compliance with the uncontrolled exposure guidelines is not an issue. However, the controlled site area was evaluated for compliance with the occupational maximum permissible exposure (MPE) limit with respect to the changes specified for KKFR. Compliance with this limit was established based on a “worst case” estimation of ground-level power density using the Commission's *FM Model,* Version 2.10, software which is designed to calculate power density levels accessible at locations two meters above ground for various FM antenna types.

It is predicted that the new antenna will result in a worst case ground-level power density contribution of 39.76 $\mu W/cm^2$ at locations 27 meters distant from the antenna supporting structure. This worst case level is illustrated on the power density versus distance graph attached as Figure 1. Since this estimated level is less than 5% of the MPE limit for controlled exposure of 1,000 $\mu W/cm^2$, the applicant is not required to further evaluate the antenna location with respect to other RF contributors.

It has been demonstrated that the proposal will comply with the occupational exposure guideline at any ground-level location. At higher elevations on the antenna structure, however, workers will be protected from excessive exposure to RF fields in accordance with the methods recommended in *OET Bulletin No. 65, Version 97-01.* Moreover, the applicant is a party to the coordinated work policy agreement currently in practice at the multi-user site. Preventive steps for avoiding excessive exposure generally include scheduling work while the facility operates at reduced power or is shut down.

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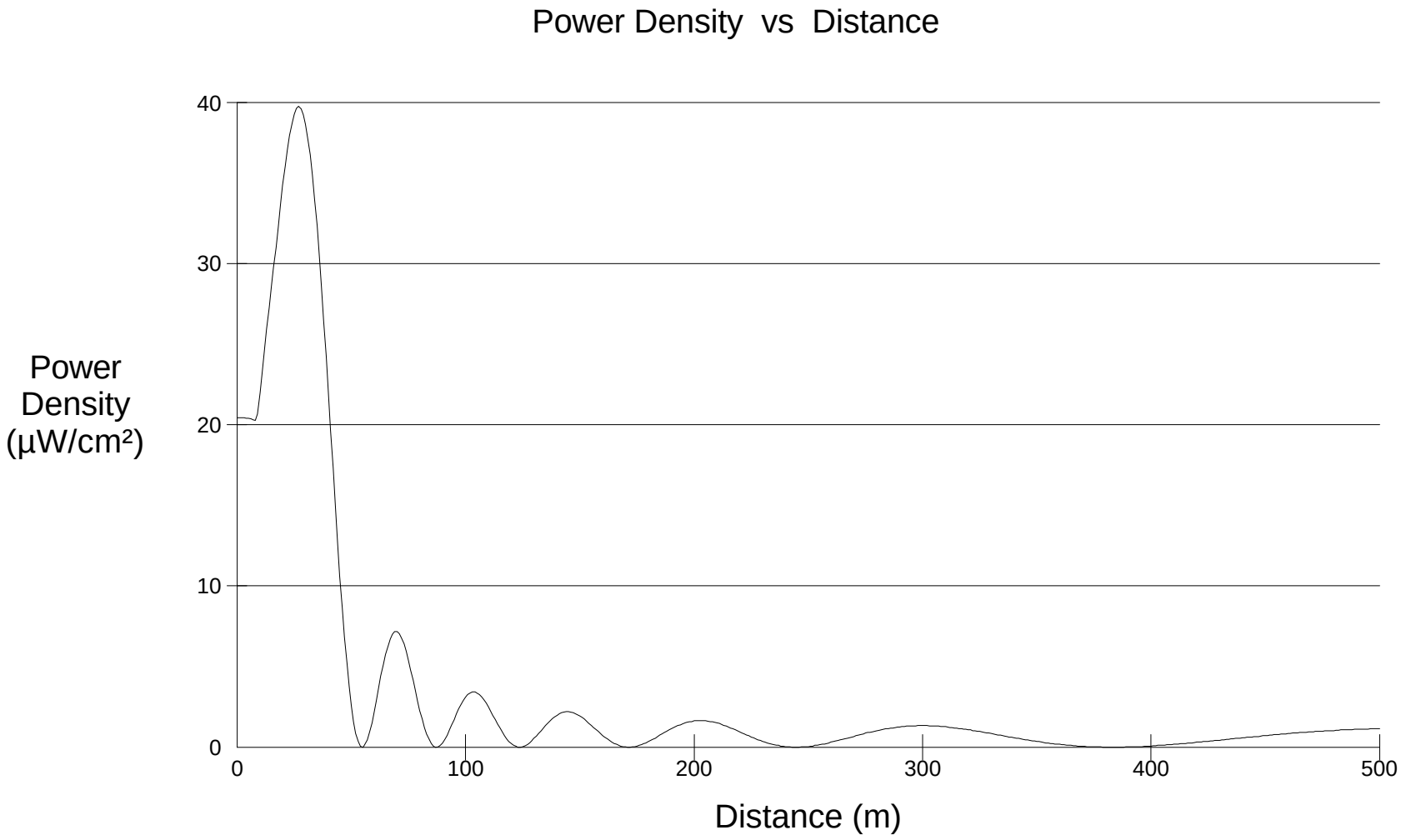
KKFR(FM) - Main Facility Modification



Office of Engineering and Technology

Distance (m): 500 **Antenna Type: ERI or Jampro JBCP "Rototiller" (EPA)**

Horizontal ERP: 100,000
Vertical ERP: 100,000 **Number of Elements: 8**
Antenna Height (m): 101 **Element Spacing: 1**

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FIGURE 1