

Exhibit 35 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
CBS Radio Inc. of Washington, DC
WJFK-FM Manassas, Virginia
Facility ID 28625
Ch. 294B 20 kW(Max-DA) 223 m

CBS Radio Inc. of Washington, DC (“*CBS Radio*”), licensee³ of WJFK-FM (Ch. 294B, Manassas, VA), herein proposes changes to the WJFK-FM main antenna directional pattern and maximum effective radiated power (“ERP”).

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. Because no change in structure height is proposed, 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 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-half wavelength-spaced “Rototiller” circularly-polarized antenna is proposed for WJFK-FM. According to information provided by the manufacturer, this antenna has an elevation pattern of 0.2 relative field factor at depression angles 25 or more degrees below the horizon. The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 for the entire FM broadcast band is 200 $\mu\text{W}/\text{cm}^2$.

³ FCC File Number BMLH-20081216BLA.

Exhibit 35 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 2 of 3)

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 ten (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, facility ERP, and manufacturer-provided relative-field value, it was determined that the proposed facility would contribute a worst-case RF power density of 1.3 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near the antenna support structure, or 0.7 percent of the general population/uncontrolled limit.

§1.1307(b)(3) states that facilities at locations with multiple emitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent of the pertinent MPE limit. 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 continue to be restricted and controlled through the use of a locked fence. According to information provided by the applicant, appropriate RF exposure warning signs are posted.

Exhibit 35 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 3 of 3)

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 is 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.