

## EXHIBIT 22

The purpose for this application is to increase the height of the existing FM antenna above ground level to lower the radio frequency power density levels at the surrounding ground levels.

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 the applicable safety standards specified in 47 C.F.R. Section 1.1307(b), (ANSI C95.1-1982 and ANSI C95.1-1991).

The existing antenna site is limited to authorized personnel by means of a locked gate and fence surrounding the antenna support tower and should be considered a controlled environment since public access is restricted from this area.

The Maximum Permissible Exposure (MPE) for controlled environments at the FM frequency of 91.3 MHz is 1000 uW/cm<sup>2</sup>. The contributing radio frequency power density at a height of 2.0 meters above ground level from the KOAB-FM antenna, radiating a total of 25 kW ERP-H and 10 kW ERP-V, may be determined by the equation (10) on page 23 of the FCC OST Bulletin No. 65 dated August 1997.

The maximum relative field strength at the depression angle of -68 degrees towards the ground for the Harris Type FMC-4B four element antenna, with one wavelength element spacing, is less than 0.30. A portion of this vertical plane relative field is plotted in the attached graph EXHIBIT 22A.

The center of radiation for the four element antenna is 60 meters above ground level. The maximum power density 2.0 meters above ground level, at all depression angles of -12 to -90 degrees, is:

$$S = \frac{33.4 \times (0.30)^2 \times 35,000 \text{ watts}}{(58 \text{ m})^2}$$

$$S = 31.3 \text{ uW/cm}^2$$

The total radio frequency power density, at a height of 2.0 meters above ground level at the base and in the vicinity of the antenna supporting tower, resulting from the proposed channel 217C2 FM operation, will not exceed 32 uW/cm<sup>2</sup>.

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Therefore, the proposed installation does comply with ANSI and FCC specified guidelines for uncontrolled human exposure to radio frequency radiation. The antenna supporting tower is fenced to prevent unauthorized access. The Applicant will instruct all personnel to terminate RF radiations from this antenna when service work requires that persons climb the tower for any purpose.

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.

EXHIBIT 22B is a plot of the RF power density at distances from the antenna support tower structure resulting from the KOAB-FM antenna radiation.