

EXHIBIT 31

WKLB-FM ENGINEERING STATEMENT

This engineering statement has been prepared on behalf of Charles River Broadcasting Company, licensee of FM radio station WKLB-FM, Waltham, Massachusetts and is in support of an application for a new auxiliary antenna.

At present WKLB-FM is authorized to operate on Channel 273B (102.5 MHz) with 8.1 kW effective radiated power (ERP) and 351 meters antenna height above average terrain (HAAT). WKLB-FM is proposing to utilize the WBZ-TV main antenna tower site for the new auxiliary facility and operate with 12 kW ERP and 276 meters HAAT. The proposed auxiliary facilities are consistent with the FCC Rules concerning maintaining the auxiliary 1 mV/m contour within the 1 mV/m contour of the WKLB-FM licensed¹ main facilities (see attached map).

Antenna Site

The WKLB(FM) proposed auxiliary antenna site is located at the following geographic coordinates (NAD-27): N 42° 18' 37", W 71° 14' 14".

Antenna Structure Registration

The antenna structure registration number associated with this site is 1003433.

¹ (BLH-19981216KA)

Antenna Height and Elevation Data

Overall Height of the Tower Above Ground:	395.1 meters
Height of Radiation Center Above Ground:	273.0 meters
Height of Radiation Center Above Mean Sea Level:	320.0 meters
Height of Radiation Center Above Average terrain:	276.0 meters

Antenna and Power Data

Effective Radiated Power:	12.0 kW (H)	12.0 kW (V)
FM Antenna:	ERI FM 1083-4CP Non-Directional	

Environmental Statement

As previously stated, the proposed WKLB-FM auxiliary operation will be from the existing licensed antenna site of WBZ-TV; therefore, the environmental issues listed in Section 1.1307(a) of the FCC Rules and Regulations are not pertinent.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum combined effective radiated power of 24.0 kW, an antenna relative field factor of 0.40 and antenna radiation center of 273 meters above ground level, the proposed WKLB(FM) auxiliary operation would have a maximum of 1.7 microwatts per

square centimeter ($\mu\text{W}/\text{cm}^2$) RF field (0.009% of the FCC guidelines) at 2 meters above ground level. Since there are other users on the tower, an evaluation has been made of all stations and is as follows:

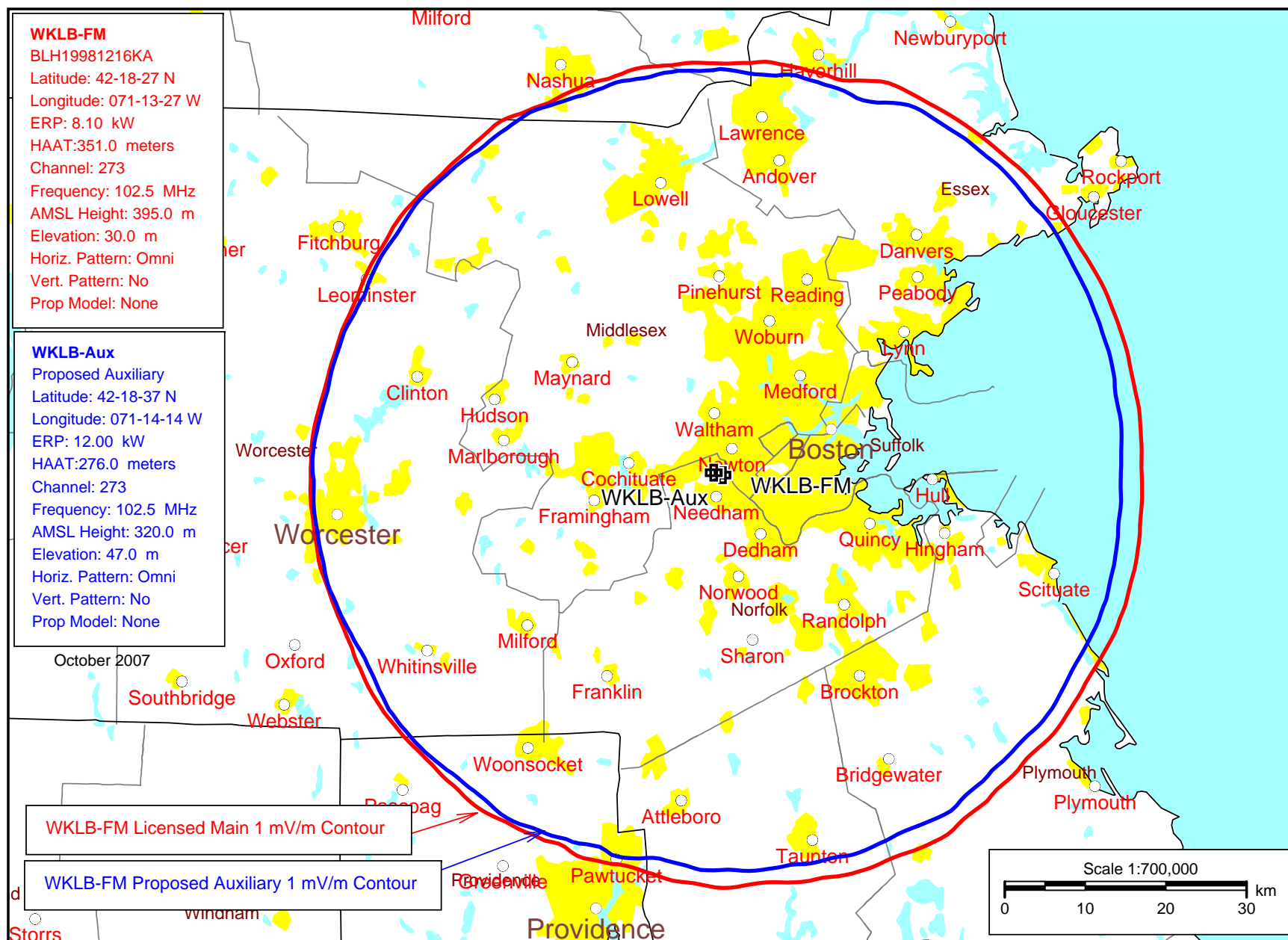
<u>Station Call</u>	<u>Channel</u>	<u>Location City/State</u>	<u>ERP(Horz.) kW</u>	<u>Antenna AGL</u>	<u>Antenna Factor</u>	<u>$\mu\text{W}/\text{cm}^2$</u>
WGBH-TV (Lic.)	2	Boston, MA	72.4	331m	0.40	1.8
WBZ-TV (Lic.)	4	Boston, MA	60.3	350m	0.40	1.3
WCVB-TV (Lic.)	5	Boston, MA	61.7	350m	0.40	1.4
WGBH-DT (Lic.)	19	Boston, MA	700.0	370m	0.40	13.8
WCVB-DT (Lic.)	20	Boston, MA	625.0	387m	0.40	11.3
WBZ-DT (Lic.)	30	Boston, MA	825.0	387m	0.40	14.9
WSBK-DT (Lic.)	39	Boston, MA	135.0	387m	0.40	2.4
WGBX-DT (Lic.)	43	Boston, MA	500.0	387m	0.40	9.0
WGBX-TV (Lic.)	44	Boston, MA	1100.0	370m	0.40	21.7
TV Combined Total						77.6

The Commission's guidelines for the FM and TV VHF bands are 1,000 $\mu\text{W}/\text{cm}^2$ for the occupational/controlled and 200 $\mu\text{W}/\text{cm}^2$ for the general population/uncontrolled environment. The Commission's guidelines in $\mu\text{W}/\text{cm}^2$ for the TV UHF band are $f/1500$ and $f/300$ respectively; where f is frequency in MHz. Therefore, personnel working around the proposed WKLB-FM auxiliary facility would not be exposed to RF fields exceeding the Commission's guidelines.

With respect to work performed on the tower, station WKLB-FM, in conjunction with other users, will establish procedures to ensure that workers

are not exposed to RF fields above the Commission's guidelines, either by reducing or turning off the power, as appropriate.

For the reasons stated above, this proposal is believed to be in compliance with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.



Computed 1 mV/m Contours For The Present Licensed Main And Proposed Auxiliary Operations Of WKLB-FM, Waltham, MA