

## EXHIBIT #31

### ENVIRONMENTAL PROTECTION ACT

GEORGIA-CAROLINA WIRELESS, LLC  
WESL (New)  
Minor Modification to a Construction Permit  
BNPH-20070430CDB  
Channel 240A– 4.5 kW H & V  
Pendleton, SC  
March 2009

The applicant proposes the use of an existing registered tower (ASR #1045333), built in 2003. On its application for tower registration, the tower owner, Alltell Communications, LLC answered “No” to the environmental impact question, indicating that the tower posed no threat to the environment. It is assumed that statement is true and further environmental study was deemed unnecessary.

The proposed three-bay, circularly polarized antenna will be energized such that it produces 4.5 kW effective radiated power (ERP) in both the horizontal and vertical planes, from a center of radiation of 88.4 meters above ground. Using the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, and then by applying a combination of the element and array pattern as defined in E.P.A. study PB85-245868 ("**Engineering Assessment of the Potential Impact of the Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services**") the predicted level of RF non-ionization emissions at a position of 2 meters above ground (head-height) at the base of the tower for the proposed 3-bay ERI Roto (Type #3) antenna is 1.208 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ), which is 0.121 percent of the maximum for this fenced, locked controlled area.

A search of the FCC's CDBS and ULS databases reveals that there is one active communications antenna on the tower, WQIN631. However, since the predicted level of emissions for the instant proposal is less than 1% of maximum, no further calculations were deemed necessary.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.