

**TECHNICAL EXHIBIT 31**  
**ENVIRONMENTAL PROTECTION STATEMENT**

IN SUPPORT OF AN APPLICATION  
FOR A CONSTRUCTION PERMIT  
**WKHI(FM), FRUITLAND, MARYLAND**  
OCTOBER 2008

Since the proposed WKHI(FM) operation would be from an existing tower, the environmental concerns listed in Section 1.1307(a) of the Commission's Rules are not pertinent; therefore, those issues have not been addressed.

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 effective radiated power of 10.6 kW (H+V) and a radiation center of 104 meters above ground level, the proposed WKHI(FM) operation would have a maximum of 8.5 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.5 in the downward direction. The Commission's guidelines for the FM band 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.

According to the applicant, the present tower has an extensive (approximately 20 meters square) security fence around the tower. The above analysis indicates that members of the public and personnel working around the tower of the proposed WKHI(FM) operation would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station WKHI(FM), in coordination with other users on the tower, will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

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