Exhibit 12 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

Three Notch Communications, LLC

WAAO-LD Andalusia, AL

Facility ID 15777

Ch. 40 (Digital Flash-Cut) 15 kW

Introduction

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Three Notch Holdings Corporation herein proposes to convert low-power television station WAAO-LP, Andalusia, Alabama, Facility ID 15777 (BLTTL-19980304JZ) to digital operation. An increase in effective Radiated Power (ERP) is specified along with a different transmitting antenna. The antenna will be located on an existing tower[1] with no proposed change in overall structure height.

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 Electromagnetic Field

The proposed operation was evaluated for human exposure to radiofrequency electromagnetic field 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 exceeds 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.

[1] *See* Antenna Structure Registration number 1037280.

The WAAO-LD Channel 40 antenna center of radiation will be 79.2 meters above ground level. An ERP of 15 kilowatts, horizontally polarized, will be employed utilizing a PSI model PSILP18OMM-40 antenna. According to information provided by the antenna manufacturer, a "worst-case" elevation pattern relative field value of 0.2 is appropriate for purposes of the calculation. The "uncontrolled/general population" limit specified in §1.1310 for Channel 40 (center frequency 629 MHz) is 419.3 $\mu W/cm^2$.

OET 65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET 65.

$$\mathbf{S = (33.4098)\ (F^2)\ (ERP)\ /\ D^2}$$

Where:

S	=	power density in microwatts/cm^2
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 3.4 $\mu W/cm^2$ at two meters above ground level near antenna support structure, or 0.8 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna. If the actual vertical plane (elevation) pattern of the antenna were considered, the calculation would be even lower.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. 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 or near ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused 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 be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

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 will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower or on nearby towers 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 will 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 Section 1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.