

Exhibit 18 - Statement D
ENVIRONMENTAL CONSIDERATIONS
prepared for
Potomac Radio, LLC
WAGE Leesburg, Virginia
Facility Id 54876
1190 kHz 50 kW-D 1.3 kW-N DA-2

Nature of the Proposal

Potomac Radio, LLC (“*Potomac*”), licensee of Standard Broadcast Radio Station WAGE, 1200 kHz, Leesburg, Virginia (Facility Id 54876), has requested modification of WAGE's existing licensed operation to specify operation on an adjacent channel. A separate Application for Construction Permit (“CP”) for the proposed 1190 kHz daytime operation was filed in 2007 and subsequently granted on October 29, 2008 (see FCC file number BP-20070118AEM). The instant application thus addresses the separate nighttime aspect of the frequency change proposal. As discussed in **Exhibit 11 – Statement A**, this nighttime proposal specifies the construction of two additional towers at the station’s existing licensed location (see BL-19940228DA) while the separate daytime CP specifies the use of a different transmitter site.

FCC Rule Section 1.1307(a)(1-8) Considerations

Potomac has commissioned an environmental consultant, *blueskies environmental associates, inc.* (“*blueskies*”) to consider and evaluate the various environmental subjects outlined in the Commissions Rule Section 1.1307(a)(1-8) for both proposed transmitting locations. The *blueskies* report addressing Section 1.1307(a)(1-8) for this nighttime site will be filed as an amendment hereto. It should be noted that no tower lighting is required for the existing licensed operation and no lighting is anticipated to be employed for the additional two new towers. As will be discussed in the *blueskies* report, it is believed that no adverse environmental impact will occur as a result of a grant of the instant nighttime application.

Potential RF Exposure Considerations (Section 1.1306(b) of the Commission’s Rules)

The proposed nighttime operation at this site was evaluated for human exposure to radio frequency energy 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 radio frequency exposure guidelines adopted in Section 1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in Section 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 those guidelines.

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The proposed nighttime antenna system will employ four towers, each having an electrical height of 78.4 degrees. Therefore it is appropriate to use linear interpolation with the AM distance tables specified in the Commission's **OET-65, Supplement A** (specifically, **Table 1** for the 0.1 wavelength case and **Table 2** for the 0.25 wavelength case). The nominal power for the nighttime operation will be 1.3 kW. Using linear interpolation from the above mentioned tables and a "worst case" assumption of 1.3 kW being employed at each tower base, the minimum fence distance for this nighttime 1.3 kW facility would be 1.53 meters. Therefore each tower at the site will be enclosed by a locked fence whose bounds are no less than 1.6 meters from the tower, unless subsequent on-site measurements or calculations dictate a differing fence distance may be appropriate to satisfy the appropriate RF exposure guidelines. RF Exposure warning signs will also be posted on each fence.

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy will not be caused at accessible areas near the tower. With respect to worker safety, a site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed in the vicinity of or on the tower. 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. Further, no worker will be permitted to climb an energized tower. On-site RF exposure measurements may also be undertaken to more specifically establish the bounds of safe working areas

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.