Exhibit 34 - Statement B

ENVIRONMENTAL CONSIDERATIONS

prepared for

CBS Radio Annapolis LLC

WLZL(FM) Annapolis, Maryland

Ch. 300B 49 kW 151 m

CBS Radio Annapolis LLC ("CBS Radio") is the licensee[4] of WLZL(FM)(Ch. 300B, Annapolis, MD). *CBS Radio* proposes to replace the WLZL antenna on the existing tower[5] while making slight changes in antenna height, antenna pattern, and effective radiated power ("ERP").

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 Radiation

The proposed operation was evaluated for human exposure to radiofrequency 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 meets 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.

An Electronics Research six-bay "Rototiller" circularly-polarized antenna is proposed for WLZL. According to information provided by the manufacturer, this antenna has a worst-case antenna elevation pattern of 0.336 relative field factor at angles ten or more degrees below the horizon. The general population/uncontrolled maximum permitted exposure ("MPE") limit specified in §1.1310 for the entire FM broadcast band is 200 $\mu W/cm^2$.

[4] *See* FCC File Number BMLH-20110708ACE.

[5] *See* FCC Antenna Structure Registration Number 1036204.

For the purpose of this study, "public access" will be considered at the base of the tower at a location two-meters above ground. The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET 65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

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

Using the above formula, facility ERP, and manufacturer-provided relative-field value, it was determined that the proposed facility would contribute a worst-case RF power density of 18.8 μW/cm^2 at two meters above ground level near the antenna support structure, or 9.4 percent of the general population/uncontrolled limit.

WNEW-FM (Ch. 256B, Bowie, MD, Facility ID 72177) also operates an auxiliary antenna from the same antenna support structure, licensed with an ERP of 19 kW at a height above ground of 131 meters.[6] According to the FCC Media Bureau database, WNEW-FM utilizes an Electronics Research six-bay, one-half wavelength spaced "Rototiller" circularly-polarized antenna. According to information provided by the manufacturer, this antenna has a worst-case elevation pattern of 0.213 at depression angles 20 degrees or more below the horizon.

Using the same procedure, it was determined that the WNEW-FM auxiliary facility, when operational, would contribute a worst-case RF power density of 3.5 μW/cm^2 at two meters above ground level near the antenna support structure, or 1.8 percent of the general population/uncontrolled limit. When combined with the predicted exposure from the proposed WLZL facility, the RF power density reaches 11.2 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. With the

[6] *See* FCC File Number BXMLH-20090105AGE.

exception of a proposed WLZL auxiliary antenna[7] that will never be operational when the proposed WLZL main antenna is in use, no other non-excluded facilities are located on this tower.

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy will not be caused by the proposal 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 continue to be restricted and controlled through the use of a locked fence. According to information provided by the applicant, appropriate RF exposure warning signs are 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 is employed protecting maintenance workers from excessive exposure when work must be performed on the tower 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 would otherwise 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 §1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

[7] *See* FCC File Number BXPH-20120913AAJ.