

Exhibit 29 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Citadel Broadcasting Company
KHKI(FM) Des Moines, Iowa
Facility ID 12966
Ch. 247C1 105 kW 143 m

Nature of The Proposal

Citadel Broadcasting Company (“*Citadel*”), licensee of KHKI(FM) Des Moines, Iowa, herein proposes to replace its main antenna. The proposed antenna will be side-mounted on an existing antenna support tower. The proposed effective radiated power (“ERP”) is 105 kilowatts with an antenna height above ground of 128.6 meters.

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. No change in structure height is proposed, thus 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

In keeping with §1.1307(b) of the Commission’s Rules, the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines specified in §1.1310 of the Commission’s Rules. Under present Commission policy, a facility may be presumed to comply with the limits in §1.1310 of the Commission’s Rules 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.

The proposed KHKI transmitting antenna will be installed such that its center of radiation is 128.6 meters above ground level. A maximum ERP of 105 kilowatts, circularly polarized, will be employed. Referencing the elevation pattern in the attached **Figure 1**, the proposed KHKI antenna will have a “worst case” relative field value of less than 0.29 from 5 to 90 degrees below the

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horizontal plane (i.e.: below the antenna). Thus, a relative field value of 29 percent is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for FM radio frequencies is $200 \mu\text{W}/\text{cm}^2$.

Using formula 10 from OET 65, the proposed facility would contribute a power density of $36.9 \mu\text{W}/\text{cm}^2$ at locations two meters above ground level near antenna support structure. This is 18.4 percent of the “uncontrolled/general population” limit. At ground level locations farther away from the base of the support structure, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

According to the Commission’s database, there are two additional non-excluded emitters authorized near this site, KJJY(FM) (Facility ID 22882, Channel 223C2, West Des Moines, IA) and K41DD (Facility ID 64174, Des Moines, IA), a low-power UHF translator station on Channel 41. KJJY and K41DD are located on an adjacent tower structure 200 meters from that of KHKI.

According to license data extracted from the Commission’s database, KJJY employs an ERP of 41 kilowatts, horizontally and vertically polarized, using a Continental G5CPS-3E antenna located 148 meters above ground level. Referencing the elevation pattern in the attached **Figure 2**¹, the KJJY antenna has a “worst case” relative field of less than 0.45 from 15 to 90 degrees below the horizontal plane. Thus, a relative field value of 45 percent is used for this calculation. Calculations per OET Bulletin 65 show that KJJY contributes a “worst case” power density of $26.0 \mu\text{W}/\text{cm}^2$ at two meters above ground level near the KJJY tower base, which is 13.01 percent of the uncontrolled/general population limit. This “worst case” power density lessens at locations farther from the KJJY tower base, as a consequence of the increasing distance from the KJJY antenna.

¹ The Continental G5 antenna, manufactured by Electronics Research, has an identical elevation pattern to that of the ERI model SHP antenna. Thus, **Figure 2** is appropriate for use with the KJJY(FM) antenna.

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Low-power UHF translator station K41DD, according to data extracted from the Commission's database, employs an ERP of 33.2 kilowatts, horizontally polarized, with a Dielectric Model TLP-16 antenna located 140 meters above ground level. Referencing the elevation pattern in the attached **Figure 3**, the K41DD antenna has a "worst case" relative field 0.15 from 10 to 90 degrees below the horizontal plane. Thus, a relative field value of 15 percent is used for this calculation. Calculations per OET Bulletin 65 show that K41DD contributes a "worst case" power density of $0.66 \mu\text{W}/\text{cm}^2$ at two meters above ground level near the K41DD tower base, which is 0.15 percent of the uncontrolled/general population limit of $423.33 \mu\text{W}/\text{cm}^2$ for UHF Channel 41. This "worst case" power density lessens at locations farther from the tower base, as a consequence of the increasing distance from the antenna.

Summing the individual "worst case" contributions to RF exposure from KHKI, KJJY and K41DD, the total level of RF electromagnetic field is 31.56 percent of the uncontrolled / general population MPE limit at two meters above ground level. No other authorized FM, AM, or TV stations are located within 8 km of the KHKI site.

Thus, based on this analysis, the Commission's limit regarding general population / uncontrolled exposure to RF electromagnetic field is not exceeded at ground level locations near the KHKI tower site. 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 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 continue to be restricted and controlled by the site owner. An existing fence around the base of the tower will continue to be maintained to restrict access. Additionally, appropriate RF exposure warning signs will continue to be posted.

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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 include, but are 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. *Citadel* will coordinate with other licensees utilizing this antenna support structure. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas.

Conclusion

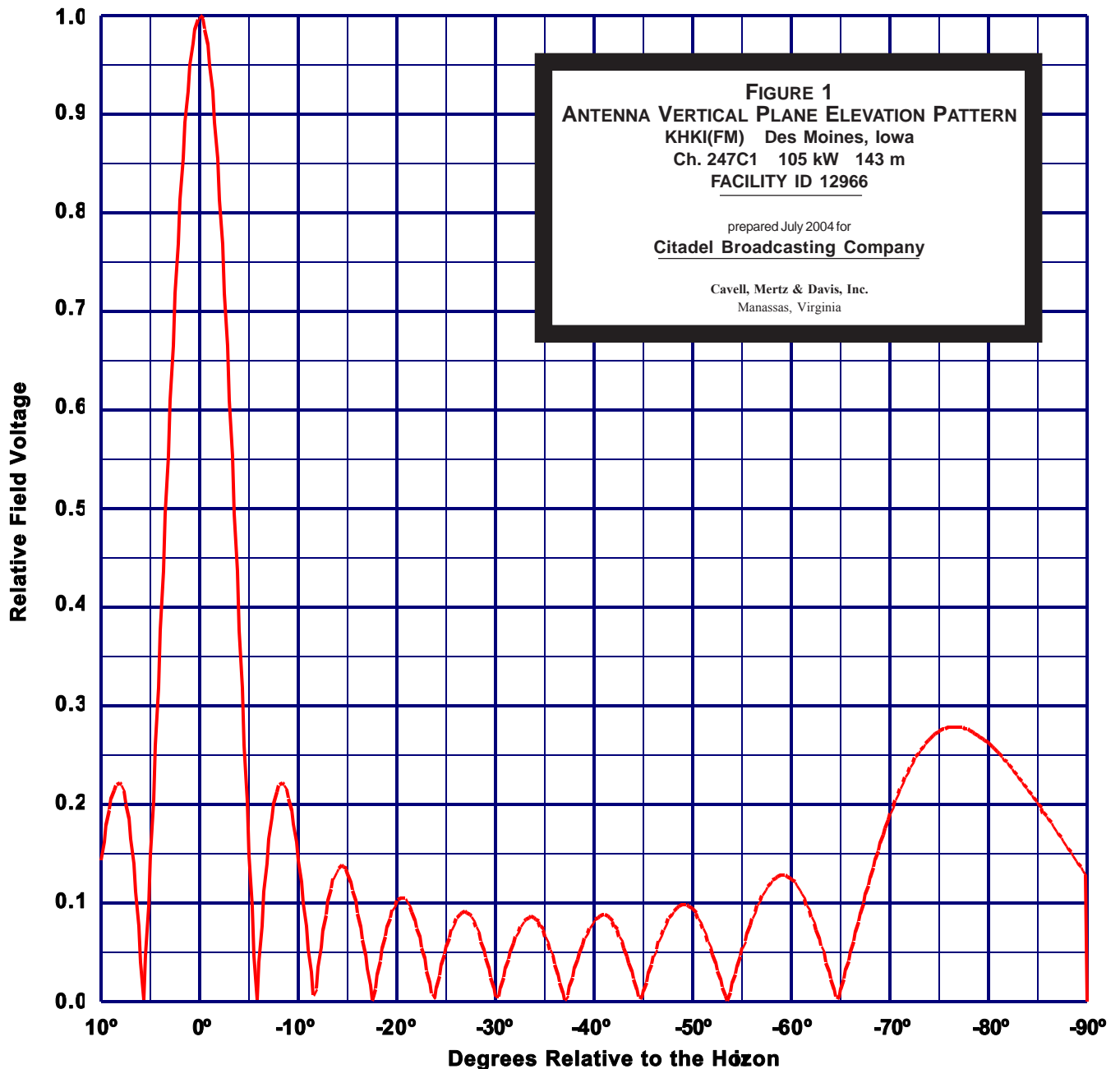
Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.



Vertical Plane Relative Field Pattern

ERI TYPE SHP, SHPX, MP, MPX, LP OR LPX ELEMENTS

***A 10 level, 1 wave-length spaced non directional antenna
with 0° beam tilt, 0% null fill and a H/V maximum power ratio of 1.000***



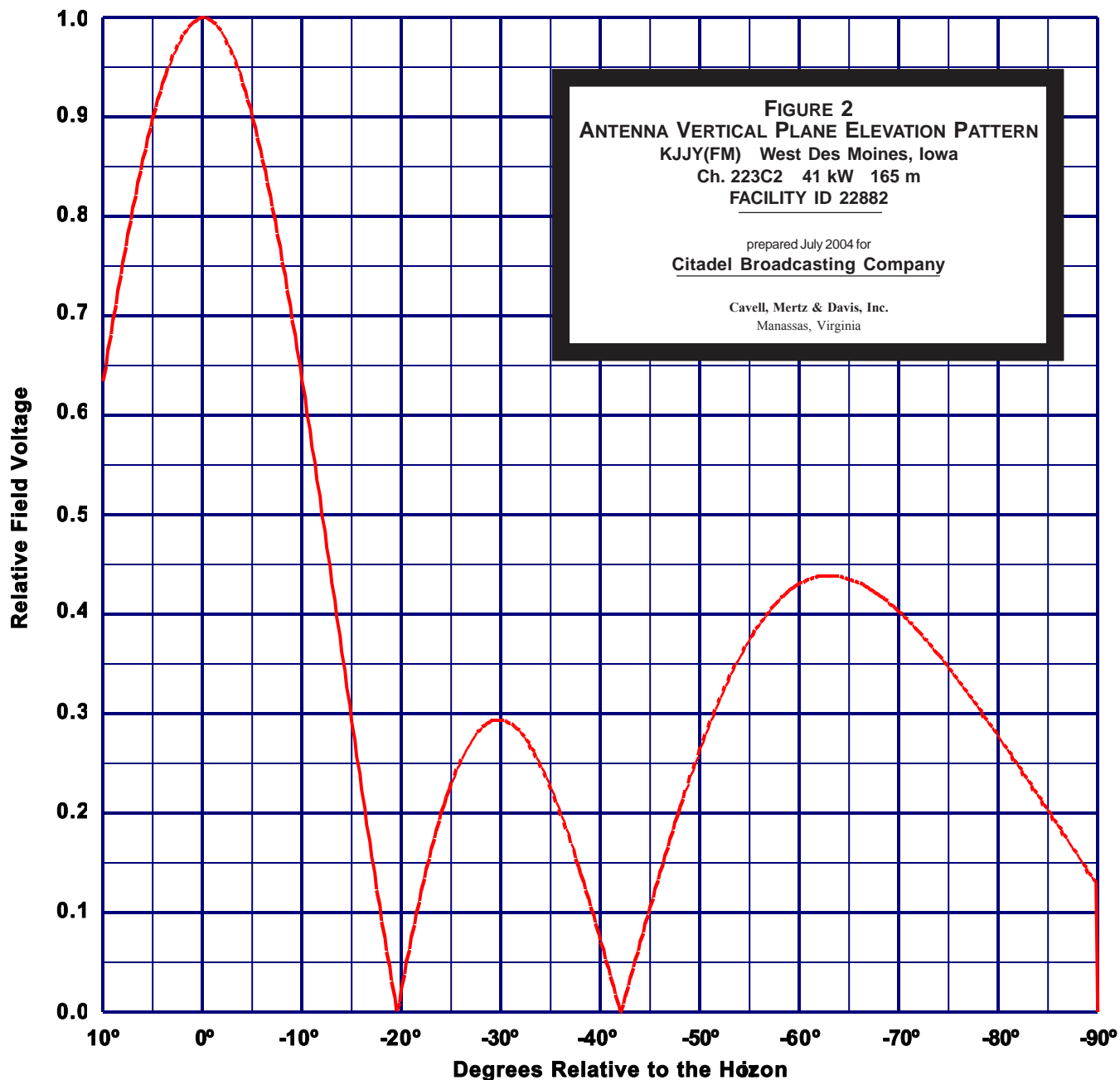


Vertical Plane Relative Field Pattern

ERI TYPE SHP, SHPX, MP, MPX, LP OR LPX ELEMENTS

A 3 level, 1 wave-length spaced non directional antenna

with 0° beam tilt, 0% null fill and a H/V maximum power ratio of 1.000



DIELECTRIC COMMUNICATIONS ANTENNAS

A UNIT OF GENERAL SIGNAL

Proposal Number: _____ Revision: _____ Date: _____

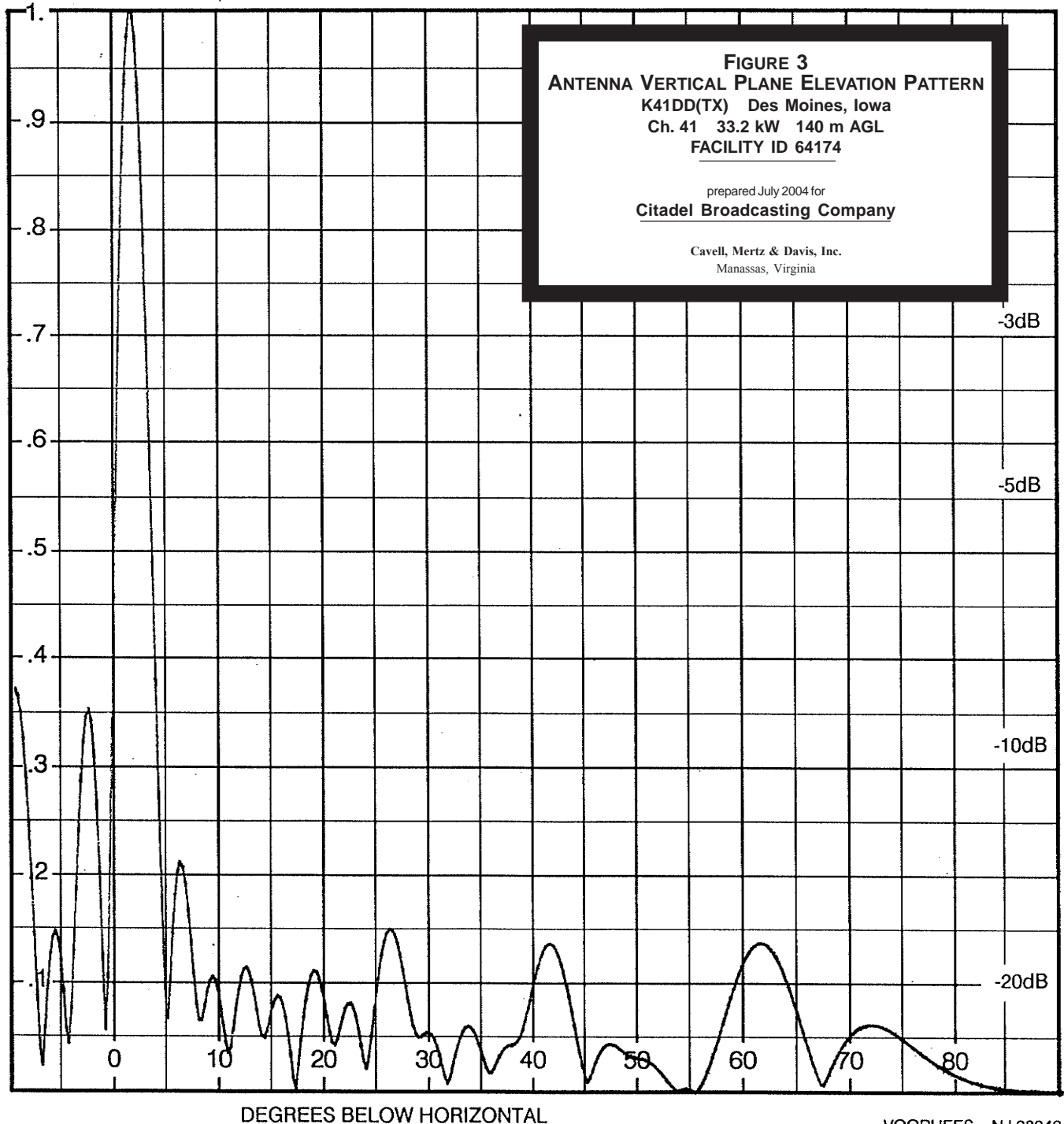
Call Letters: _____ Channel: _____ Antenna Type: TLP-16

Location: _____ Customer: _____

VERTICAL PATTERN.

RMS Gain at Main Lobe: _____ dB Beam Tilt: _____ degrees Frequency: _____ MHz

RMS Gain at Horizontal: _____ dB Calculated: _____ Measured: _____ Drawing #: _____



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