

Exhibit 22 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**The Wheeler School**  
WELH(FM) Providence, Rhode Island  
Facility ID 66656  
**Ch. 201A 4 kW (Max DA) 41 m**

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.

### **Nature of The Proposal**

*The Wheeler School ("Wheeler")*, licensee of WELH(FM)(Ch. 201A, Providence, Rhode Island) herein seeks to amend its pending Application for Construction Permit (File Number BPED-20070906AGD). The proposed facility would operate on Channel 201 (88.1 MHz) with an effective radiated power ("ERP") of 4 kW utilizing a directional, circularly polarized antenna to be located at a height above ground level ("HAG") of 39.6 meters. The support structure is an existing tower having a height of 36.6 meters above ground. The instant proposal will add a top-mounted antenna that would increase the overall height of the supporting structure by 4.6 meters.

Because the overall height is less than 200 feet and there are no airports within 8 kilometers of the site<sup>1</sup>, structure marking and lighting is not required. 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. 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 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 radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be

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<sup>1</sup> According to the FCC TOWAIR program.

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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.

Plans have not yet been finalized regarding the transmitting antenna system. Therefore, for the purpose of this study, a worst-case elevation plan relative field of 100% was considered. A circularly polarized, effective radiated power (“ERP”) of 4 kilowatts will be employed.

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:

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

Using this formula, power density was calculated at a point 2 meters above ground level at the base of the existing tower structure. The proposed facility will contribute a maximum power density of 189.1 μW/cm<sup>2</sup> or 94.6 percent of the general population/uncontrolled limit<sup>2</sup>. This field will reduce at locations farther from the tower due to the increasing distance from the transmitting antenna. There are no other emitters of radiofrequency energy on the tower.

Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at 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 by the proposal at publicly accessible areas at ground level near the antenna supporting structure. Tower access will be restricted and controlled and appropriate RF exposure warning signs will be posted.

<sup>2</sup> The general population/uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 of the FCC Rules for FM broadcast frequencies is 200 μW/cm<sup>2</sup>.

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Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines.

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 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.