Exhibit 43 - Statement C

ENVIRONMENTAL CONSIDERATIONS

prepared for

Lincoln Broadcasting Company,

A California Limited Partnership

KTSF-DT San Francisco, California

Facility ID 37511

DTV Ch. 27 500 kW 403.4 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.

The CP modification sought by *Lincoln* is to side mount the KTSF-DT facility on an existing tower located at the developed communications site atop Mt. San Bruno, near San Francisco, having an Antenna Structure Registration number 1010566. The Mt. San Bruno site is a "defacto" antenna farm including many other exiting towers and other facilities. No change in the overall height of the structure is involved.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of Section 1.1306 of the Commission's Rules. *Lincoln*'s legal counsel has advised that the CP modification is categorically excluded from environmental processing pursuant to Sections 1.1306 and 1.1307. This Statement C is provided in order to assure full compliance with all potentially applicable requirements.

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 exceeds the radiofrequency guidelines adopted in Section 1.1310 of the Commission's Rules. 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 modified transmitting system will comply with the cited adopted guidelines.

The modified transmitting system's center of radiation will be located 52.8 meters above ground level. An ERP of 500 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer (see **Exhibit 40 - Figure 2** and **Exhibit 40 - Table I**), the antenna has a relative field of 7.5% or less from 25 to 90 degrees below the horizontal plane (i.e.: below the antenna) on Channel 27. Thus, a value of 7.5% relative field is used for this calculation. The "controlled / occupational population" limit specified in Section 1.1310 for Channel 27 (center frequency 551 MHz) is 1,836.7 μW/cm²; the corresponding "uncontrolled / general population" limit is 367.3 μW/cm².

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 (9) in OET-65.

$$S = ((33.4098) \times (F5) \times (ERP))/D5$$

Where:

S	=	power density in microwatts/cm²
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Using this formula, the proposed facility would contribute on a "worst case" basis a maximum power density of 36.4 μW/cm² at two meters above ground level about the base of the supporting structure or 9.9 % of the "general population / uncontrolled" limit and 1.98 % of the controlled / occupational" limit.

Because the preceding simplified evaluation assumes a non-directional horizontal plane antenna pattern and flat terrain surrounding the tower site and does not take into account the actual terrain features, a more detailed review of the antenna pattern and terrain features surrounding the proposed site was also performed. According to a representative of the applicant, access to portions

of the summit of San Bruno Mountain is restricted. The tower is located within an existing fenced compound, which is considered a "controlled" area. Specifically, access to the transmitter site compound is restricted with a fence, locked gates, and warning signs. Only authorized and trained personnel are permitted within the fenced area. Further, steep terrain and heavy foliage (bramble bushes and poison oak) surrounding the tower itself serves to discourage and restrict casual access to some locations immediately outside the fenced compound. For these reasons, the applicant considers the fenced area and adjacent steep terrain to be restricted, and the "controlled / occupational" exposure limits to RF electromagnetic field would apply in these locations.

Further, as indicated on the "San Francisco – South" U.S.G.S. Quadrangle map and from detailed site maps provided by the applicant, the terrain slopes away from the proposed site except in the towards 270° True, where the terrain rises slightly. Considering actual terrain elevations near the site and the manufacturer provided horizontal plane and elevation pattern data shown in **Exhibit 40 - Figure 1**, **Figure 2** and **Table I**, RF density levels attributable to the proposed KTSF-DT facility will be less than five percent of the "uncontrolled / general population" limit at any location 2 meters above ground except one small area at the extreme western edge of the public road on an azimuth of 110° True from the tower where the RF density is predicted to reach 5.6% of the "uncontrolled / general population" limit. Thus, except for this one location, detailed calculations show that the proposal's contribution to RF density is less than 5% of the "uncontrolled / general population" limit at all locations 2 meters above actual ground level. Nonetheless, once construction of the KTSF-DT facility is completed, RF density measurements will be performed. In many instances, actual "on-site" measurements have shown RF density levels to be below the levels predicted using the methods in OET-65. Based on the results of these measurements, the applicant has indicated that it plans to add any additional access restriction and / or facility modifications that may be necessary to ensure compliance with the Commission's exposure limits.

Safety of the General Public

The communication site atop Mt. San Bruno is a controlled access site. Based on information provided by a representative of the applicant, access to the area surrounding the tower will continue to be limited by a locked fence. The fence will prevent access to the site from the

publicly accessible nearby roadway. Appropriate RF exposure warning signs will continue to be posted. Only authorized and trained personnel are permitted within the fenced area. Further, steep terrain surrounding the site serves to discourage and restrict casual access to some locations in close proximity to the site outside the fenced area. For these reasons, the applicant considers the fenced area to be restricted, and the "controlled / occupational" exposure limits to RF electromagnetic fields would apply in these locations. However, as stated earlier, when the surrounding terrain is considered in combination with the proposed directional antenna pattern, the RF density attributable to the proposal falls below the five percent "uncontrolled / general population" limit in areas surrounding the fenced tower site.

Section 1.1307(b)(3) of the FCC Rules states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the area 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 other facilities near the site may be considered independently from the 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 in Section 1.1307(b) of the FCC Rules.

Safety of Tower Workers

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in the areas at ground level. A site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on the tower (or on nearby towers) in area where high RF levels may be present. Such protective measures may include, but if necessary will not be limited to, power reduction, or the complete shutdown of facilities when work or inspections must be performed in an area 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, including with respect to advance notification of worker presence to all users of the tower and adjacent areas of the site.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing and is deemed to have no significant effect on the quality of the human environment under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.