

Exhibit 35 – Statement A  
**COMPREHENSIVE ENGINEERING STATEMENT**  
prepared for  
**Radio License Holdings LLC**  
WDRQ(FM) Auxiliary Detroit, Michigan  
Facility ID 70040  
Ch. 226B 5.1 kW 240 m

*Radio License Holdings LLC* (“*Cumulus*”), is the licensee of FM radio station WDRQ(FM) (Ch. 226B, Detroit, Michigan). A license for an Auxiliary antenna has been granted to WDRQ(FM) (FCC file number BLH-911031KB). This Auxiliary License does not appear in CDBS; however a PDF scan of the paper copy from the station’s files has been provided as an attachment to this engineering statement. *Cumulus* herein proposes to modify the station’s auxiliary antenna, to specify a higher antenna location at lower power. Specifically, *Cumulus* seeks to increase the auxiliary antenna to 240 meters Height Above Average Terrain (“HAAT”) with an Effective Radiated Power (“ERP”) of 5.1 kW. A minor coordinate correction to 42° 27’ 12.8” N Latitude and 83° 09’ 49.4” W Longitude (NAD 27) is also specified to agree with the coordinates of the registered tower (ASRN 1001506).

**Figure 1** demonstrates that the 60 dB $\mu$  (1 mV/m) contour of the proposed auxiliary facility would not extend beyond the bounds of the 60 dB $\mu$  contour of the authorized main facility, in compliance with §73.1675(a)(1). Because minimum distance spacing and contour protection rules do not apply to auxiliary facilities, the instant proposal is believed to comply with all pertinent FCC allocations requirements.

Standard Broadcast station WRDT(AM) (560 kHz, Monroe, MI) utilizes the same tower for its 14 Watt non-directional night time operation using a folded unipole style radiator. No new construction is proposed for the instant application, since the antenna is an existing Master FM antenna, combined operation with WDVD(FM) (Ch 242B, Detroit, MI), WZDZ(FM) (Ch 254B, Detroit, MI) and WYCD(FM) (Ch 258B, Detroit, MI). According to representatives of the applicant, no changes have been observed in the operating impedance of WRDT as a result of the antenna installation, so no special condition should be necessary. The nearest FCC monitoring station is at Allegan, Michigan at a distance of 230.01 km from the proposed site. This exceeds by a great margin the minimum distance specified in §73.1030(c)(3)(iv) that would suggest consideration of the monitoring station.

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It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters for an auxiliary facility.

**Environmental Considerations**

The proposed facility will utilize a Master FM antenna system, in common with WDZH(FM), WYCD(FM) and WDVD(FM), with a circularly-polarized omnidirectional antenna, at 238 meters AGL on a registered tower (ASRN 1001506). 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**

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 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.

An effective radiated power ("ERP") of 5.1 kW, circularly polarized, will be employed, utilizing an ERI model number 1183-2CP-2, a 2-bay antenna with a bay spacing of 114 inches, or 0.9 wavelengths at 93.1 MHz. The "uncontrolled/general population" limit specified in §1.1310 for FM broadcast facilities is 200  $\mu\text{W}/\text{cm}^2$ .

For the purpose of this study, "public access" will be considered at the base of the tower at a location two meters above ground. Using the FCC's FM Model program and an EPA Type 1: Ring and Stub antenna, it was determined that the proposed facility would contribute a worst-case RF power density of 3.18  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near the antenna support structure, or 1.59 percent of the general population/uncontrolled limit. Thus, based on this analysis, the

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Commission's limit regarding general population / uncontrolled exposure to RF electromagnetic field is not exceeded at ground level locations near the WDRQ(FM) Auxiliary site location.

§1.1307(b)(3) states that facilities at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the areas 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 any other facilities using this site may be considered independently from this 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 under §1.1307(b).

**Safety of Tower Workers and the General Public**

As demonstrated herein, excessive levels of RF energy attributable to WDRQ(FM) 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, appropriate RF exposure warning signs will be posted and access will be restricted by fencing and other appropriate means.

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 or in areas where high RF levels may be present. Such protective measures 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.

**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.

**EXHIBIT 35 - FIGURE 1  
COVERAGE CONTOUR COMPARISON**

*prepared June 2019 for*

**Radio License Holdings LLC  
WDRQ(FM) Detroit, MI  
Facility ID 70040  
Ch. 226B 5.1 kW 240 m**

**Cavell, Mertz & Associates, Inc.  
Manassas, Virginia**

**WDRQ(FM) License**  
60 dBμ F(50,50)  
TX Site

**WDRQ(FM) (Aux) Proposed**  
60 dBμ F(50,50)  
TX Site

