

Exhibit 30 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**

prepared for  
**Infinity Broadcasting East, Inc.**  
WHFS(FM) Annapolis, Maryland  
Facility ID 72177  
Ch. 256B 45 kW 157 m

Infinity Broadcasting East, Inc. (“*Infinity*”) is the licensee of radio station WHFS(FM), Ch. 256B, Annapolis, Maryland. (FCC File Number BLH-19891006KA). The instant application seeks to change the WHFS transmitter location, ERP, and antenna elevation. Infinity proposes to employ an existing tower structure while making no change in overall height. The tower has been assigned Antenna Structure Registration number 1035814.

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 §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 WHFS transmitting antenna system will consist of a side-mounted, four bay, ½ wavelength spaced antenna at 141 meters above ground. A circularly polarized effective radiated power of 45 kilowatts will be employed. Referencing the elevation pattern in the attached **Figure 3**, the proposed antenna will have a relative field of 0.2 or less from 25 to 90 degrees below the

Exhibit 30 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
(page 2 of 3)

horizontal plane (i.e.: below the antenna). Thus, a relative field value of 0.2 is used for this calculation.

Under these assumptions, the proposed facility would contribute a power density of  $6.2 \mu\text{W}/\text{cm}^2$ , or 3.10 percent of the “general population/uncontrolled” limit at 2 meters above ground level. The “general population uncontrolled” limit for 99.1 MHz is  $200 \mu\text{W}/\text{cm}^2$

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters (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 various other facilities near 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 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.

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 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 will be exceeded. On-site RF exposure

Exhibit 30 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
(page 3 of 3)

measurements may also be undertaken to establish the bounds of safe working areas. *Infinity* 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.



# Vertical Plane Relative Field Pattern

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

A 4 level, .5 wave-length spaced non directional antenna  
with 0° beam tilt, 0% null fill and a H/V maximum power ratio of 1.000

