

Exhibit 35 – Engineering Statement

***CBS Radio East Inc.***

WIAD(FM)(Aux) Bethesda, Maryland

Facility ID 9619

Ch. 234B 23.5 kW 217 m

*CBS Radio East Inc.* proposes to install a second auxiliary antenna for WIAD Bethesda, Maryland.<sup>1</sup> The proposed facility will operate with an antenna height of 217 meters above average terrain (HAAT) and an effective radiated power (ERP) of 23.5 kW. This Statement addresses the allocations, environmental, and radiofrequency concerns related to this proposal.

The attached coverage map Figure 1 demonstrates that the proposed 1.0 mV/m (60 dB $\mu$ ) coverage contour does not extend beyond that of the WIAD main antenna as required by FCC Rule §73.1670. A detailed view is provided as Figure 2. There are no nearby AM facilities that trigger FCC requirements to study those antenna systems.<sup>2</sup> Thus, it is believed that the proposed facility satisfies all allocation matters.

The proposed facility uses an existing tower with no change in overall height, marking, or lighting specifications. Consequently, this application is categorically excluded from environmental processing.

The proposed operation was evaluated for radiofrequency exposure using the FCC Office of Engineering and Technology's updated *FMMModel* software<sup>3</sup> which calculates RF power density at ground level given the height, power, and type of FM broadcast antenna. As demonstrated in the following, the proposed transmitting system complies with the FCC's general population/uncontrolled maximum permitted exposure (MPE) exposure guideline of 200  $\mu$ W/cm<sup>2</sup> for the FM broadcast band.

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<sup>1</sup> *CBS Radio East Inc.* seeks to retain the licensed auxiliary antenna (FCC File Number BXLH-20021004AAF). The proposed facility is an additional auxiliary antenna that would be used in case the presently licensed main antenna is out of service for repairs or replacement.

<sup>2</sup> The nearest AM station, non-directional WAVA(AM) Arlington, VA, is four wavelengths away.

<sup>3</sup> See FCC Public Notice DA 16-340, Released March 31, 2016.

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An Electronics Research two-bay, one wavelength-spaced, model 1183 circularly-polarized panel antenna is proposed for WIAD.<sup>4</sup> Using this antenna type and WIAD's proposed parameters as input values, *FMMModel* predicts a maximum, ground-level power density of 19.86  $\mu\text{W}/\text{cm}^2$  or 9.9 percent of the MPE.

Co-located WITH(FM) Washington, DC is licensed to use a similar antenna from the same site.<sup>5</sup> With WIHT's licensed parameters as input values, *FMMModel* predicts a maximum WIHT ground level power density of 16.4  $\mu\text{W}/\text{cm}^2$  or 8.2 percent of the MPE. Along with WIAD, the two non-excluded facilities at this site total 18.1 percent of the MPE; well less than the FCC limit.

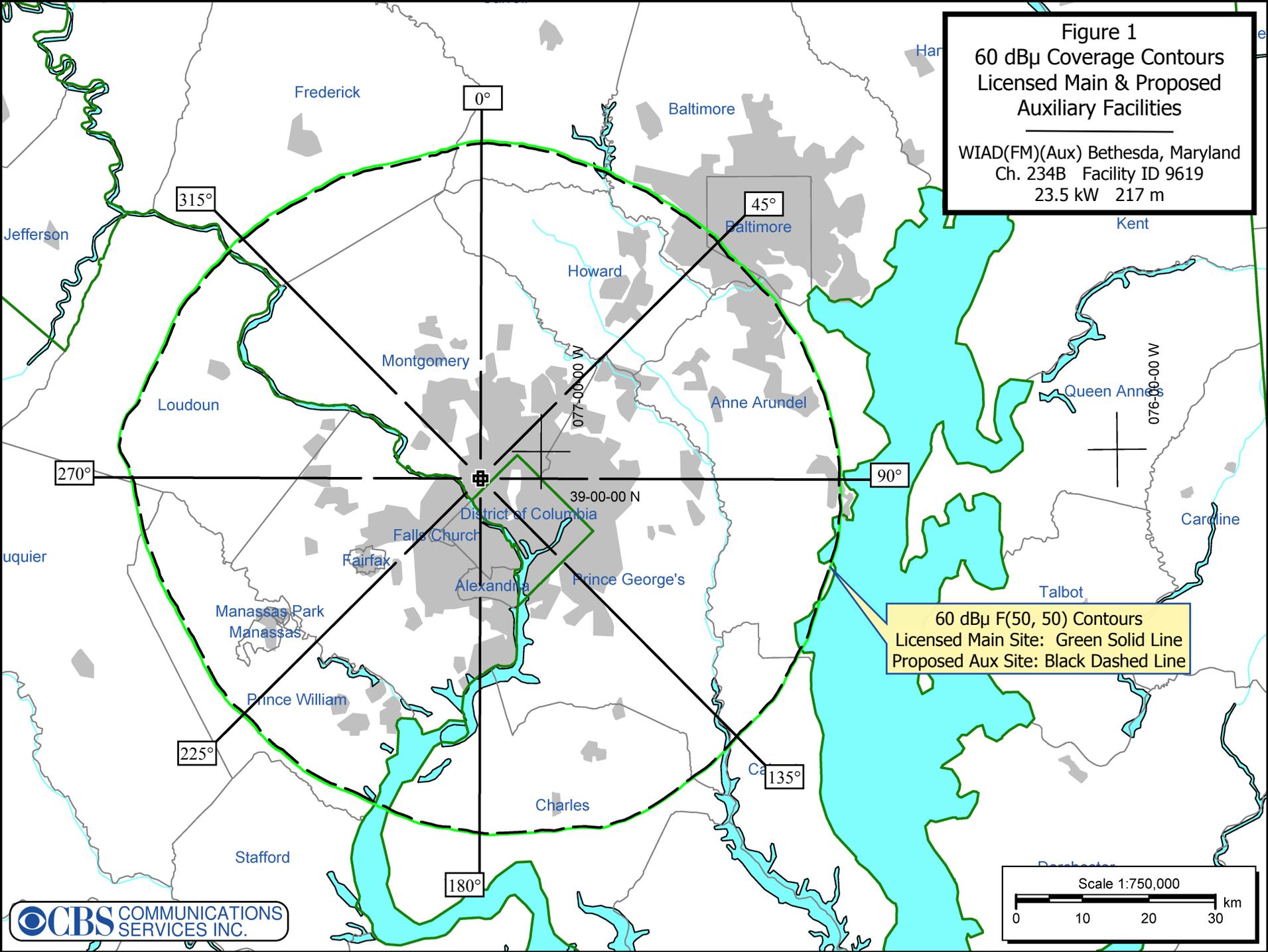
Tower access will continue to be controlled and appropriate RF exposure warning signs will continue to be posted. A site exposure policy is in effect that includes restriction of access, power reduction, or the complete shutdown of facilities when work must be performed where predicted RF levels exceed appropriate guidelines. 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.

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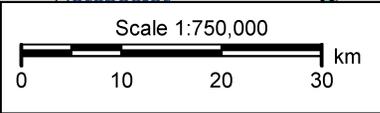
<sup>4</sup> This is an EPA "Type 1" antenna.

<sup>5</sup> See FCC File BLH-19931215KE.

**Figure 1**  
**60 dB $\mu$  Coverage Contours**  
**Licensed Main & Proposed**  
**Auxiliary Facilities**  
 WIAD(FM)(Aux) Bethesda, Maryland  
 Ch. 234B Facility ID 9619  
 23.5 kW 217 m



60 dB $\mu$  F(50, 50) Contours  
 Licensed Main Site: Green Solid Line  
 Proposed Aux Site: Black Dashed Line



**Figure 2**  
**60 dB $\mu$  Coverage Contours**  
**Licensed Main & Proposed**  
**Auxiliary Facilities - Detailed View**

WIAD(FM)(Aux) Bethesda, Maryland  
Ch. 234B Facility ID 9619  
23.5 kW 217 m

60 dB $\mu$  F(50, 50) Contours  
Licensed Main Site: Green Solid Line  
Proposed Aux Site: Black Dashed Line

Calvert

