



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN APPLICATION FOR  
MODIFICATION OF LICENSE  
KHNR-FM, HONOLULU, HAWAII  
CH. 248C1, 80.0 kW ERP, 11 m HAAT  
FACILITY ID. NUMBER 34620**

I am a Radio Engineer in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Northern Radio of Honolulu, Inc., licensee of KHNR-FM, Honolulu, Hawaii, to prepare this statement and the technical portion of FCC Form 302-FM in support of an Application for Modification of License, FCC File No. BLH-820713AC. This application reports the replacement of the KHNR-FM nondirectional antenna with a new nondirectional antenna.

**ANTENNA HEIGHT**

Presently, KHNR-FM is authorized under FCC License No. BLH-820713AC. For convenience, a copy of the current KHNR-FM license authorization is attached. The new KHNR-FM antenna was installed such that its centerline height above ground level is 3 meters below the authorized antenna height. The ground elevation at the KHNR-FM tower location is 2 meters.

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The antenna heights proposed herein and the licensed values are listed below:

	<u>Proposed</u>	<u>Licensed</u>
Antenna Height Above Ground Level	136	139
Antenna Height Above Mean Sea Level	138	141
Antenna Height Above Average Terrain	11	14

Pursuant to Section 73.1690(c)(1) of the FCC Rules, the 3 meter decrease in antenna height is a permissible change and may be reported via the instant application for modification of license.

ANTENNA STRUCTURE REGISTRATION

As indicated on the attached FCC License, the KHNR-FM antenna is located on an existing pole atop the Ala Moana Hotel, 410 Atkinson Drive, Honolulu, Hawaii, and no obstruction marking or lighting is necessary. The KHNR-FM support pole is located 79 feet from a taller, lighted, registered structure (ASR Number 1019034) on the same rooftop in a congested area of Honolulu. In accordance with Section 17.14(a) of the FCC Rules, the KHNR-FM support pole is therefore exempt from FAA notification requirements and FCC tower registration requirements.

### RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The current guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations, as well as "uncontrolled" situations that apply in cases that affect the general public. The FCC's Office of Engineering and Technology (OET) Commission issued a technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997), to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The Bulletin contains technical information for evaluating compliance with the current FCC policies and guidelines.

As stated above, the KHNR-FM antenna is side-mounted on a pole which is located atop a high rise building. The height of the building is 400 feet ( 122 meters) above ground level. The KHNR-FM antenna center of radiation is located 14 meters above roof level and 136 meters above ground level. Considering the KHNR-FM Shively 6800 series, 8-bay, one-half wavelength spaced antenna specified herein, the FCC's FM Model program

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predicts that the KHNR-FM will produce a maximum power density of only  $1.7 \mu\text{W}/\text{cm}^2$  at two meters above ground level. This represents only 0.85% of the  $200 \mu\text{W}/\text{cm}^2$  FCC guideline value for “uncontrolled” environments. However, at two meters above roof level, the KHNR-FM predicted power density is in excess of the uncontrolled guideline value out to a horizontal distance of 413 feet from the KHNR-FM support pole. There are no buildings, roof tops or other publically accessible spaces within 413 horizontal feet of the KHNR-FM support pole. Both the analog and digital television facilities for KITV, Honolulu, HI, are also located atop the same building as the KHNR-FM antenna.

According to the FM Model program, KHNR-FM will produce a maximum power density of  $229.8 \mu\text{W}/\text{cm}^2$  at two meters above roof level. This represents only 2.29% of the  $1000 \mu\text{W}/\text{cm}^2$  FCC guideline value for “controlled” environments.


The entire rooftop is a “controlled” or occupational RFR environment. Access to the roof is restricted by means of locked hatches and RFR warning signs are posted at appropriate intervals. Only authorized personnel will be permitted to gain access to the rooftop. A comprehensive RFR occupational safety plan is in effect for the rooftop which provides for a power reduction schedule, rooftop markings, postings and appropriate warning signs. The marked areas on the rooftop identify “occupational safe” areas where the measured cumulative power density was found to be below the FCC’s occupational guideline value. Authorized personnel working on the rooftop, outside the “occupational safe” areas, will be educated in the time/exposure limits applicable to all areas of the rooftop.

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The applicant remains committed to reducing power and/or ceasing operation in cooperation with other site users during times of service or maintenance of the transmission systems, as necessary, to avoid potentially harmful exposure to personnel.

The technical parameters of the KHNR-FM transmission system are provided in the attached FCC Form 302-FM. It is submitted that the FM facility is compliant with FCC technical standards.

DATED: June 8, 2005



William J. Getz