

MODIFY BPCDT-19991029AFW
EAGLE III BROADCASTING, LLC
KKCO-DT TELEVISION STATION
CH 12 DTV - 5.3 KW
GRAND JUNCTION, COLORADO
July 2002

EXHIBIT A

Radio Frequency and Environmental Assessment

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. §1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997 ("Bulletin"), regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. This study considers all nearby stations and utilizes the appropriate formulas contained in the Bulletin.

Environmental Analysis

The tower on which the KKCO-DT facility will be located does not involve the use of high intensity white lighting (strokes) in a residential neighborhood. The structure is not located in an officially designated wilderness area or wildlife preserve, nor does it threaten the existence or habitat of endangered species. The facility does not affect districts, sites, buildings, structures or objects significant in American history, architecture, archaeology, engineering or culture that are listed in the National Register of Historic Places, or are eligible for listing, nor does it affect Indian religious sites. Further, the site is not located in a flood plain and will not, to the knowledge of the licensee, require significant change in surface features (wetland fill, deforestation or water diversion) at the time of construction. It is noted that the transmitter site is under the jurisdiction of the Bureau of Land Management. However this location, known as

the Black Ridge Communications Site, is an established electronics site at which KKCO's NTSC facility has been located for several years. Eagle III Broadcasting, LLC ("Eagle"), further notes that access to the Black Ridge site is limited to site users only. The access road to the site is gated at approximately 2.5 miles from the tower location, which prevents casual trespass of the site. All personnel having access to the site are fully trained with respect to radio frequency radiation environments.

Radio Frequency Radiation Study

This radio frequency radiation study is being conducted to determine whether this proposal is in compliance with OET Bulletin Number 65, dated August 1997, regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. This study considers all nearby contributing stations, specifically the proposed co-located KKCO, and utilizes the appropriate formulas contained in the OET Bulletin.²

The proposed KKCO-DT DTV Channel 12 antenna system will be mounted with its center of radiation 88.9 meters (291.5 feet) above the ground at the tower location and will operate with an effective radiated power of 5.3 kilowatts in the horizontal plane. At two meters, the height of an average person, above the ground at the base of the tower, the KKCO antenna system will contribute 0.0141 mw. Based on exposure limitations for a controlled environment, 1.4% of the allowable ANSI limit is reached at two meters above the ground at the base of the tower. For uncontrolled environments, 7.0% of the ANSI limit is reached at two meters above the ground at the base of the tower.

2) The other users at the Black Ridge location are greater than 60 meters from the proposed KKCO-DT site and are, therefore, not considered for this instant analysis.

The KKCO NTSC Channel 11 antenna system will be mounted with its center of radiation 83.1 meters (272.5 feet) above the ground at the tower location and will operate with an effective radiated power of 155 kilowatts in the horizontal plane. As denoted in OET Bulletin #65, Supplement A, Page 30, the typical VHF antenna system has a downward radiation field of 0.2. As such, the KKCO antenna system radio frequency radiation calculations were made based on an effective radiated power of 6.2 kilowatts. At two meters, the height of an average person, above the ground at the base of the tower, the KKCO antenna system will contribute 0.0189 mw. Based on exposure limitations for a controlled environments, 1.9% of the allowable ANSI limit is reached at two meters above the ground at the base of the tower. For uncontrolled environments, 9.4% of the ANSI limit is reached at two meters above the ground at the base of the tower.

Combining the contributions of KKCO-DT and KKCO, a total of 16.4% of the limit is reached at two meters above the ground at the base of the tower. Since this level for uncontrolled environments is below the 100% limit defined by the Commission, the proposed KKCO-DT facility is believed to be in compliance with the radio frequency radiation exposure limits as required by the Federal Communications Commission. Further, Eagle will insure that warning signs in the vicinity of the tower warning of potential radio frequency radiation hazards at the site. Eagle will also reduce the power of the proposed facility or cease operation, in cooperation and coordination with other tower users, as necessary, to protect persons having access to the site, tower or antenna from radio frequency radiation in excess of FCC guidelines. Based on the above factors, this proposal is categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rule