

## **EXHIBIT # 22**

### **R.F. EMISSIONS COMPLIANCE STATEMENT**

Channel 210 – 0.35 kW H & V  
Santa Barbara, California

April 2006

The KSBX antenna is located at an antenna farm on Gibraltar Peak north of Santa Barbara. There are numerous exempt and non-exempt transmitters at the site. Broadcast antennas currently operating from the site can be found on page # 3 of this exhibit. Access to the site is limited to the public by a gated and locked fence except where there are natural boundaries (i.e. steep terrain or dense and impassable bushes), therefore the entire area within the boundary is a controlled area. The applicant's antenna sits at the edge of a precipice and therefore has access from one side only. The area immediately below the applicant's antenna, on the side that is accessible, there is a second perimeter fence around the pole which supports the applicant's current antenna and which will support the proposed antenna. Both fences are properly signed with an R.F. emissions hazard sign warning the public and workers that they are not to enter the area.

Recently, KCBX contracted Tom King Communications of Santa Barbara to measure the RF emissions around the perimeter of the enclosed site. His report was filed with KSBX's license renewal. The report states: "All observed readings were below the Maximum Permissible Exposure (MPE) to Public Standards as defined in FCC OET 65 (appendix A) in areas where the general public would have access. The facility meets the current guidelines for maximum permissible exposure to RFR in all areas where the general public has access. "

While the applicant proposes to increase KSBX's ERP from 0.05 kW to 0.35 kW the applicant proposes to counteract the effect of the increase by using a specialized half-wave antenna.

The proposed antenna will be energized such that it produces 0.35 kW effective radiated power, circularly polarized, from a center of radiation of 6 meters above ground. Since this antenna is directional, the Commission has deemed that use of the EPA studied antenna type would be inappropriate. For the purposes of this study we have used the ERI SHP, SHPX, LP or LPX two-element, half-wave spaced, vertical elevation field toward the nadir. (See exhibit #1, page #10 for the graph). The OST formulas were then used to calculate the downward radiation at points 2 meters above the ground (head height) within a short distance of the tower. Based on the vertical elevation field graph of the existing ERI LP antenna, the proposed antenna will, at least, half the field at all pertinent downward angles. The following table calculates the MPE at various distances from the tower base of the



proposed antenna under a controlled environment:

Downward angle	Effective Field	Distance from Base	Microwatts/sq cm	% MPE
-90	-0	0 M	0	0
-76	.018	1 M	0.445	0.045
-54	0.22	3 M	30.3	3.03
-22	0.795	10 M	127.4	12.7
-15	0.89	15 M	76.9	7.69

This antenna does not exceed the Commission's MPE at any downward angle. The other stations operating at this site will also contribute to the maximums. Since the applicant has an existing set of measurements on hand, once construction has been completed and before the license application has been filed, KSBX will take a second set of readings to be sure that no new hot spots have been created. If in the event the combination of RF emissions from the other stations at the site and the applicant's emissions exceed the maximum, at any location affect by the applicant's emissions, the applicant will post new signs or expand the existing fencing.

In regard to protecting workers at the tower site, the applicant will reduce its operating power or cease operating in the event a worker is within a range of its antenna where the sum of all non-ionization radiation exposure would exceed the maximum permissible exposure for the time period involved. An agreement exists with other users at the site to reduce power or to terminate transmission when a worker is on or near the tower where exposure would result in greater than the MPE allowable under Commission's Rules. Consequently, the applicant appears to be in full compliance with the Commission's rules and regulations regarding protection from excess R.F. emissions for workers and the general public.



ID Stations Study at 34 27 57 N, 119 40 37 W, Search Distance = 2 km

Call	Service	City	State	Chan.	Power	Coordinates	Dist-km	Azimuth	File Number	
AM										
KTMS	L	SANTA BARBARA	CA	990	0005.000kW	342815N 1194033W	000.6	010.3	BL19880927AB	AM
FM										
K210AD	X	Santa Barbara	CA	210D	0000.009kW	342757N 1194037W	000.0	000.0	BLFT19830509MG	FM
KMGQ	M	Gol eta	CA	292A	0000.940kW	342757N 1194037W	000.0	000.0	BMLH20001228AAL	FM
KSBX	M	Santa Barbara	CA	208A	0000.050kW	342757N 1194037W	000.0	000.0	BLED20030807AGF	FM
KJEE	M	Monteci to	CA	225A	0000.820kW	342757N 1194037W	000.0	000.0	BLH19940209KC	FM
K218CP	X	Santa Barbara	CA	218D	0000.008kW	342757N 1194038W	000.0	270.4	BMLFT20050620ACH	FM
K272DT	X	Santa Barbara	CA	272D	0000.004kW	342756N 1194037W	000.0	180.6	BLFT19980126TE	FM
KDB	M	Santa Barbara	CA	229B	0012.500kW	342758N 1194037W	000.0	359.4	BLH6774	FM
KDARF1	B	Santa Barbara	CA	252D	0000.550kW	342756N 1194038W	000.0	220.0	BNPFTB20040603AC	FM
KQSC	M	Santa Barbara	CA	204B	0012.000kW	342755N 1194037W	000.1	180.3	BMLD20030930AMQ	FM
KMROF2	B	Santa Barbara	CA	212D	0001.000kW	342755N 1194037W	000.1	180.3	BLFTB20050216ACS	FM
KSBL	M	Carpi nter i a	CA	269A	0000.994kW	342755N 1194037W	000.1	180.3	BMLH19991022ABO	FM
K254AH	X	I sl a Vi sta	CA	254D	0000.010kW	342801N 1194037W	000.1	359.9	BLFT20000926ANE	FM
TV										
K15DB	X	Santa Barbara	CA	15-T	0003.250kW	342757N 1194037W	000.0	000.0	BLTT19990223JA	TV
KVMM-C	C	Santa Barbara	CA	41-T	0040.000kW	342757N 1194038W	000.0	270.4	BLTTA20040625AAH	TV
K49EK	X	Santa Barbara	CA	49-T	0005.620kW	342757N 1194038W	000.0	270.4	BLTTL19990216JC	TV
KSBT-L	X	Santa Barbara	CA	32NT	0004.580kW	342757N 1194038W	000.0	270.4	BLTTL19990922AAQ	TV
KBAB-L	X	Santa Barbara	CA	51ZT	0003.570kW	342758N 1194037W	000.0	359.4	BLTT20020612AAJ	TV
K08MP	X	Santa Barbara	CA	08+T	0003.000kW	342755N 1194038W	000.1	202.7	BPTVL20051228ADI	TV
K59CD	X	Santa Barbara	CA	59NT	0001.180kW	342755N 1194038W	000.1	202.7	BLTT19810206I X	TV
KTSB-L	X	Santa Barbara	CA	43+T	0010.000kW	342755N 1194038W	000.1	202.7	BLTTL19970620JD	TV
K08MP	X	Santa Barbara	CA	08+T	0000.750kW	342755N 1194038W	000.1	202.7	BLTVL20001218ADD	TV
KWHY-L	X	Santa Barbara	CA	22+T	0000.590kW	342756N 1194040W	000.1	248.2	BLTTL20010416AAT	TV
K26FT	X	Santa Barbara	CA	26ZT	0000.397kW	342756N 1194040W	000.1	248.2	BLTT20020418AAW	TV