



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN AMENDMENT TO AN  
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT  
FCC FILE NO. BMPH-20050601BWT  
KXOL-FM, LOS ANGELES, CALIFORNIA  
CHANNEL 242B, 7.0 kW (DA-MAX), 388 m HAAT  
FACILITY ID NUMBER: 28848**

Licensee: KXOL Licensing, Inc.

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 (FCC).

This office has been authorized by KXOL Licensing, Inc., licensee of KXOL-FM, Los Angeles, California, to prepare this minor amendment to the above-referenced application for modification of construction permit. This statement is intended to replace the Radiofrequency Impact section of the engineering statement contained in the original application. No further changes are proposed herein.

**RADIOFREQUENCY IMPACT**

The proposed KXOL(FM) facility will operate from an existing tower in the Verdugo Hills. The licensed KROQ-FM, Pasadena, CA, main (BLH-980324KA) and auxiliary (BLH-970814KD) antenna, along with the auxiliary antenna for KRTH-FM, Los Angeles, CA, (BLH-981009KG), are side-mounted on another tower which is located 106 meters

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(approximately 350 feet) from the proposed location of KXOL-FM.<sup>1</sup> Consequently, the proposed site is considered a multiple use transmitter site.

The current FCC MPE level for “uncontrolled” environments is 0.2 milliwatt per centimeter squared ( $\text{mW}/\text{cm}^2$ ) or  $200 \mu\text{W}/\text{cm}^2$  for FM facilities. The MPE level for FM facilities in a “controlled” environment is  $1.0 \text{mW}/\text{cm}^2$ .

The proposed KXOL-FM facility will operate with a 4-bay, one-half wavelength spaced ERI Rototiller type antenna with a maximum ERP of 7.0 kW (DA-MAX). As proposed in the original application, the KXOL-FM antenna will be installed such that its center of radiation is 24 meters AGL. Based on the FCC's FM Model Program, which considers the specific antenna type and predicts the power density at two meters above ground level, the proposed KXOL-FM facility is predicted to produce a maximum power density of  $24.2 \mu\text{W}/\text{cm}^2$ . This represents only 12.1% of the FCC Guideline value for uncontrolled RFR environments.

The KRTH-FM auxiliary antenna (a Jampro JSCP-3, 3-bay, one-wavelength spaced, “Double V” type antenna) is side-mounted such that its radiation centerline height is 52 meters above ground level. Based on the FCC's FM Model Program, the KRTH-FM auxiliary facility is predicted to produce a maximum power density of  $28.6 \mu\text{W}/\text{cm}^2$  at two meters above ground level. This represents only 14.3% of the FCC Guideline value for uncontrolled RFR environments.

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<sup>1</sup> The ground elevation at the KROQ-FM/KRTH-AUX transmitter site is the same as the ground elevation at the proposed KXOL-FM transmitter site.

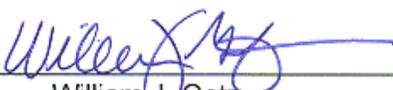
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Both the KROQ-FM main facility and the KROQ-FM auxiliary facility are authorized to operate with a maximum ERP of 5.6 kW. The KROQ-FM auxiliary antenna (an ERI FMH-3, 3-bay, one-wavelength spaced, Rototiller type antenna) is side-mounted at a height of 43 meters above ground level, which is 20 meters below the authorized height of the KROQ-FM main antenna. By definition, the KROQ-FM main antenna and the KROQ-FM auxiliary antenna will never be in operation at the same time. Accordingly, only the KROQ-FM auxiliary antenna is considered herein to provide for a worst-case RFR analysis of the predicted KROQ-FM power density contribution. Based on the FCC's FM Model Program, the KROQ-FM auxiliary facility is predicted to produce a maximum power density of 23.3  $\mu\text{W}/\text{cm}^2$  at two meters above ground level. This represents only 11.7% of the FCC Guideline value for uncontrolled RFR environments.

As demonstrated above, based on worst-case considerations, the maximum cumulative predicted power density at the shared site represents only 38.1% of the FCC guideline value for "uncontrolled" environments.

Further, the applicant is committed to reducing power or ceasing operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic fields in excess of FCC's occupational guidelines.

DATED: June 7, 2005

  
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William J. Getz