

ENVIRONMENTAL STATEMENT
K294CW PHOENIX, ARIZONA, CH 294D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
NOVEMBER 2017

The applicant proposes exchanging its current antenna on an existing 24 meter non-registered tower. The proposed Center of Radiation will be 20 meters Above Ground Level. A BEXT directional antenna is being proposed, with a maximum Effective Radiated Power of 250 watts with circular polarization. Calculations were made using FM Model for Windows, version 2.10. The proposed antenna Center of Radiation, above ground, was reduced by 2 meters to allow for the average height of a human on the ground. FM Model predicts a peak exposure of $30.88 \mu\text{w}/\text{cm}^2$ at a distance of 6 meters from the base of the tower. This represents 15.4% of the allowable Maximum Permissible Exposure ("MPE") of $200 \mu\text{w}/\text{cm}^2$ for uncontrolled environments at any point on the ground.

There are other FM translator CP's at this same tower site, but K294CW was the first FM licensed at the site. The only change being proposed by this application is a change in the directional pattern from the currently licensed K294CW operation. The new proposed antenna will produce no more power density at any point on the ground than the currently licensed antenna system. Thus it will remain in compliance with other users at the site.

The applicant will ensure that the public access to the tower is restricted by fencing, anti-climb devices or other appropriate measures. The site will be posted with

RF warning signs. If climbing of the tower by authorized personnel becomes necessary, transmitter power will be reduced to safe operating levels, or transmission even terminated, as necessary as not to exceed the RF exposure limits to tower workers. The licensee will cooperate with other users at the site with the scheduling of such tower or antenna maintenance.

No modification of the existing tower is proposed, other than the proposed side mounting of the antenna system and addition of a transmission line. The tower was constructed prior to March 16, 2001. The National Programmatic Agreement generally allows such a collocation without consultation or review under Section 106 and Subpart B of 36 CFR §800. The applicant believes that it is in full compliance with the Agreement, and that no further study is required.