

ENVIRONMENTAL STATEMENT
K267CD LOVELAND, COLORADO, CH. 267D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
APRIL 2016

The applicant proposes replacing its current antenna on an existing 27 meter un-registered tower. The proposed Center of Radiation will be 13 meters Above Ground Level. A circular polarization, Scala model CA-5/CP, directional yagi antenna is proposed. 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 $13.167 \mu\text{w}/\text{cm}^2$ at a distance of 4 meters from the base of the tower. This represents 6.5 % of the allowable Maximum Permissible Exposure (“MPE”) of $200 \mu\text{w}/\text{cm}^2$ for uncontrolled environments at any point on the ground. Since the Scala antenna is not specifically listed in the FM Model program, the worse case “Type 1” antenna was used for the study.

The site is also utilized by KCWA(FM) Loveland, Colorado on channel 230A, facility ID 9761, K269EQ Loveland, Colorado, facility ID 140256 and K297AK Loveland, Colorado, facility ID 140272. According to FCC records, KCWA generates a worst case power density of $34.4355 \mu\text{w}/\text{cm}^2$, K269EQ $2.3747 \mu\text{w}/\text{cm}^2$, and K297AK $14.5 \mu\text{w}/\text{cm}^2$. Even if all four of these records were directly added, the total would be $64.4772 \mu\text{w}/\text{cm}^2$, or well below the maximum $200 \mu\text{w}/\text{cm}^2$ for un-controlled areas.

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.