

**HUMAN EXPOSURE TO RADIOFREQUENCY (“RF”) ELECTROMAGNETIC FIELDS  
COMPLIANCE STATEMENT PREPARED BY WILLIAM T. GODFEY, JR. OF THE FIRM  
KESSLER AND GEHMAN ASSOCIATES, INC. (“KGA”), TELECOMMUNICATIONS  
CONSULTING ENGINEERS IN CONNECTION WITH AN APPLICATION FOR A MINOR  
CHANGE IN LICENSE TO CHANGE CHANNELS PURSUANT TO THE FCC CLOSING  
AND CHANNEL REASSIGNMENT PUBLIC (CCRPN) NOTICE RELEASED ON 4/13/2107.**

**ENVIRONMENTAL IMPACT**

The WVNY-DT Channel 7 post-auction facility will have no significant environmental impact as defined in §1.1307 of the FCC Rules. The digital transmitter, transmission line and antenna system produces a horizontally polarized ERP of 14 kW (h-pol only). It was determined that the maximum lobe of radiation will occur at 39.9 feet from the base of the tower (102.1 ft radial distance from the antenna center). At 39.9 feet from the base of the tower, the depression angle of the main lobe will be approximately 67° below the horizontal. At that point, the relative field is 0.167 and the power density six feet above the ground will be 0.0135 mW/cm<sup>2</sup>. This equates to only 1.35% of the MPE limits for Occupational/Controlled Exposure and only 6.73% of the MPE limits for General Population/Uncontrolled Exposure authorized by the ANSI. Since operation of the proposed WVNY-DT Channel 7 post-auction facility will exceed 5.0% of the MPE limit for Occupational/Controlled Exposure or General Population/Uncontrolled Exposure at any point on the ground, the WVNY-DT Channel 7 post-auction facility is considered a “contributor” to the RF exposure environment pursuant to OET Bulletin 65, Edition 97-01. Therefore, all broadcast antennas on the WVNY tower must be analyzed and a composite study must be calculated to demonstrate that the total power density of all broadcast antennas mounted on the WFFF tower will not exceed 100% of the MPE allowable.

The only other post-auction broadcast antennas that will be on the WVNY support structure is the WFFF-DT Channel 16 post-auction facility licensed to Nexstar. The proposed WFFF-DT Channel 16 post-auction facility will have no significant environmental impact as defined in §1.1307 of the FCC Rules. The digital transmitter,

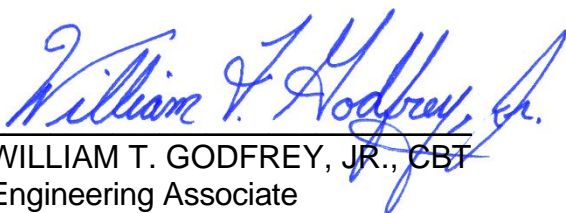
transmission line and antenna system produces a horizontally polarized ERP of 40 kW (h-pol only). It was determined that the maximum lobe of radiation will occur at 51.2 feet from the base of the tower (135.3 ft radial distance from the antenna center). At 51.2 feet from the base of the tower, the depression angle of the main lobe will be approximately 65° below the horizontal. At that point, the relative field is 0.197 and the power density six feet above the ground will be 0.0305 mW/cm<sup>2</sup>. This equates to only 1.89% of the Maximum Permissible Exposure (MPE) limits for Occupational/Controlled Exposure and only 9.44% of the MPE limits for General Population/Uncontrolled Exposure authorized by the American National Standards Institute (ANSI).

In conclusion, the proposed WVN-DT Channel 7 post-auction facility is predicted to cause 1.35% of the MPE limits for Occupational/Controlled Exposure and 6.73% of the MPE limits for General Population/Uncontrolled Exposure. The proposed WFFF-DT Channel 16 post-auction facility is predicted to cause 1.89% of the MPE limits for Occupational/Controlled Exposure and 9.44% of the MPE limits for General Population/Uncontrolled Exposure. Therefore, the combined exposure from both post-auction facilities on the WVN support structure is predicted to be 3.24% of the MPE limits for Occupational/Controlled Exposure and 16.17% of the MPE limits for General Population/Uncontrolled Exposure. Accordingly, the combined exposure from both post-auction broadcast facilities would result in exposure levels well below the allowable exposure threshold authorized by the ANSI and the FCC. It is safe to conclude that the emissions would be insignificant and well within the maximum allowable requirements.

If other antennas are placed on the tower in the future, the licensee will cooperate with those users by reducing or completely terminating the power to the antenna when maintenance workers are in danger from the electromagnetic radiation emanating from the antenna. It is also understood that additional antennas on the support structure could increase the overall RF exposure levels and it is the responsibility of each licensee to ensure that the total RF exposure resulting from the operation of all antennas on the support structure do not exceed the MPE level at any point on the ground.

**CERTIFICATION**

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

  
WILLIAM T. GODFREY, JR., CBT  
Engineering Associate

6 September, 2017