

Environmental Impact / Radio Frequency Radiation – KVMD DTS

None of the conditions specified in Section 1.1307 of the FCC rules that would require the preparation of an Environmental Assessment pertain with respect to the proposed facilities. In particular, because the proposed facilities will be installed as replacements on towers at existing sites, the proposed operations do not implicate many of the causes for further investigation and preparation of further reports.

With respect to Radio Frequency Radiation (RFR) exposure, OET Bulletin No. 65 provides methods for evaluating the level of exposure for both employees (occupational/controlled situations) and non-employees (general population/uncontrolled situations). The combination of the antenna radiation patterns, as provided in the manufacturer's technical specifications, with the antenna heights above ground level and the operating power levels indicate that the potential exposure would be between 8 and 40 percent of the Maximum Permissible Exposure (MPE) limit for general population/uncontrolled situations at both sites.

To be precise, OET-65 methods produce exposure estimates for general population/uncontrolled situations of slightly over 5 percent of the limit at Snow Peak and of approximately 40 percent at Mt Harvard, the latter of which is equivalent to approximately 8 percent of the occupational/controlled situations limit. At Snow Peak, while a gate across the road to the site limits access, it would not be sufficient to stop ordinary hikers from traversing the site, thereby making it subject to the general population/uncontrolled situations radiation limit. To determine the correct protection level needed at Mt Harvard, it is important to note that the site is surrounded by two chain-link fence barriers each with a locked gate that must be opened to access the site. Despite being situated in a national forest, the site can be accessed only by those going there to work. Thus, the Mt Harvard site can be treated as a controlled facility where the occupational/controlled situations MPE limits apply.

Since the sites have calculated exposure values potentially exceeding 5 percent of the relevant exposure limits, they are not categorically excluded from requirements for detailed RF exposure analyses of the sites. Therefore, KVMD Licensee Co., LLC will undertake RFR measurements of the sites once the antennas and transmitters are installed and will take appropriate mitigation steps should they prove to be necessary.

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Notwithstanding the foregoing, KVMD Licensee Co., LLC recognizes its responsibility for the safety and health of employees and contractors when exposed to RF radiation conditions. It will take the steps necessary to assure that personnel working in its facilities and on the towers and antennas at its sites are protected from exposure to RF radiation levels exceeding those specified in the Commission’s rules. It will work cooperatively with other users of the sites to assure safe working environments for all. Added steps to be taken may include measurements and monitoring as well as power reductions or turning off the transmitter(s), if necessary to ensure a safe working environment.