Kessler and Gehman Associates, Inc.
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Environmental Impact / RFR Hazard Analysis Study Methodology and Narrative

A theoretical analysis has been conducted of the human exposure to radio frequency radiation ("RFR") using the calculation methodology described in OET Bulletin 65, Edition 97-01. The RFR analysis is conducted pursuant to the following methodology:

> Terrain[1] extraction is compiled from the proposed tower site to radial lengths of 0.25 miles in 0.001 mile increments for 360 radials. The power density is calculated for each terrain point at 6 feet above ground level using the elevation and azimuth pattern of the proposed broadcast antenna. The power density calculations are conducted using the lower edge of the proposed channel frequency. To account for ground reflections, a coefficient of 1.6 was included in the calculation.

The resulting cylindrical polar analysis is then summarized into a coordinate plane graph using the following methodology:

> Starting from the origin the maximum calculated RFR value is determined among the 360 degree radials for each 0.001 mile increment, the value is

[1] Terrain extraction is based upon a 3 arc second point spacing terrain database.

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then converted into a percentage of the maximum allowable general population or uncontrolled exposure and plotted as a function of perpendicular distance from the tower.

The resulting RFR study demonstrates that the peak exposure is 0.439% of the most restrictive permissible exposure threshold. Pursuant to OET Bulletin 65 concerning multiple-user transmitter sites only those licensees whose transmitters produce power density levels greater than 5.0% of the exposure limit are considered significant contributors to RFR. Since the proposed operation is within 5% of the most permissible exposure at any location 2 meters above the ground, it is not considered a significant contributor to RFR exposure. Thus, contributions to exposure from other RF sources in the vicinity of the proposed facility were not taken into account. The instant application is compliant with the FCC limits for human exposure to RF radiation and thus is excluded from further environmental processing.

A chain link fence shall encompass the proposed support structure. The applicant will cooperate with any other users of the tower by reducing the power to the antenna or if necessary completely cutting it off in order to protect maintenance workers on the tower.

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