

## RFR Statement of Compliance and Spurious Emissions Condition

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The applicant proposes herein to side-mounted a shared auxiliary antenna below the licensed main WCTO(FM) [Facility ID 36997] antenna. The antenna specified herein will function as a shared auxiliary (standby) antenna to be used in times of emergency by either WCTO(FM) or WLEV(FM) [Facility ID 39875]. When the proposed auxiliary facility is used by WCTO(FM), by definition, the main WCTO(FM) antenna will be off-the-air. Under this condition, the predicted power density at the shared site represents only 69.31% of the FCC maximum public exposure guideline value for 'uncontrolled' environments.<sup>1</sup>

When the proposed auxiliary facility is used by WLEV(FM), the main WCTO(FM) antenna may be in operation. Under this condition, theoretical RFR calculations indicate that the cumulative predicted power density at the shared site would exceed 100% of the FCC maximum public exposure guideline value for 'uncontrolled' environments under this condition. Therefore, once the proposed WLEV(FM) auxiliary facility is authorized and operational, an RFR measurement survey will be conducted to determine the effect of the proposed WLEV(FM) auxiliary facility on the RFR environment. Any changes in the existing RFR safety plan, markings and/or signage will be made accordingly.

Further, the applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under section 1.1307(b) of the Commission's rules.

Finally, when two stations proposed to share an antenna, the Audio Division typically adds a special condition to these construction permits (for shared antennas) requiring measurements to demonstrate compliance with the spurious emission requirements in section 73.317 of the FCC rules. However, because only one station will use the auxiliary antenna specified herein at any given time (i.e. it will not function as a shared antenna), the applicant herein requests that the routine spurious emission condition be omitted from the auxiliary construction permit resulting from the instant application.

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<sup>1</sup> See the concurrently filed WCTO(FM) application for auxiliary construction permit, FCC Form 2100, Schedule 301, *RFR Statement of Compliance* Attachment.