

NONIONIZING RADIATION COMPLIANCE
Rubber City Radio Group, Inc.
Akron, OH

The proposed modified W228EL facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. These facilities will employ a three around Scala CA2-FM/CP, one level circularly polarized directional antenna that will be mounted at the 163.1 meter level on an existing 292.3 meter tower and will operate with a maximum effective radiated power of 250 Watts. The power density levels at two meters above ground level for the proposed facilities were calculated using Equation (9), found on page 22 of FCC OET Bulletin 65. Based on a total effective radiated power of 500 Watts and assuming, as a worst case, 100% downward radiation, it was determined that the maximum predicted power density at two meters above ground level for these facilities will be $0.64 \mu\text{W}/\text{cm}^2$. Since the permitted power density in the FM band is $200 \mu\text{W}/\text{cm}^2$, this amounts to only 0.32% of the permitted level for uncontrolled exposure. Since this is less than 5% of the permitted level, these facilities are excluded from environmental processing under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating uncontrolled exposure compliance with this standard.

The applicant will take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the power density levels are in excess of the permitted level for controlled exposure.

Because the modifications proposed in the attached application will fully comply with the FCC standard regarding human exposure to nonionizing radiation and don't involve any tower modifications which would qualify as a major environmental action, it isn't necessary to undertake any further environmental studies or submit an environmental assessment for these proposed modifications.