

NONIONIZING RADIATION COMPLIANCE
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West Virginia Radio Corporation of The Alleghenies
Cumberland, MD

The proposed modified W271AT facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. These proposed facilities will utilize a single bay circularly polarized non-directional antenna mounted at the 46 meter level on an existing 62.5 meter tower that serves as the nondirectional antenna for commonly owned WCMD(AM) - Cumberland, Maryland and will operate with a circularly polarized 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 the proposed W271AT facilities will be $8.63 \mu\text{W}/\text{cm}^2$. Since the permitted power density in the FM band is $200 \mu\text{W}/\text{cm}^2$, this amounts to only 4.3% 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 WCMD in evaluating uncontrolled exposure compliance with this standard.

W271AT, in conjunction with WCMD, will take appropriate steps to insure that workers that must be inside the fenced area around the tower base or 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 a reduction in power by WCMD when work becomes necessary in areas within the tower fence where the WCMD power density exceeds the permitted level and the cessation of operation by WCMD and the cessation of operation or a reduction in power, as appropriate, by W271AT when work becomes necessary in areas on this tower where the W271AT power density levels are in excess of the permitted level for controlled exposure.

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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.