

Exhibit 2
ENVIRONMENTAL CONSIDERATIONS
prepared for
GUENTER MARKSTEINER
WHDN-LD Naples, Florida
Facility ID 25538
Ch. 26 15 kW(MAX-DA)

Introduction

The instant proposal is not believed to have a significant environmental impact as defined under §1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Guenter Marksteiner herein seeks a license to operate a newly constructed digital companion channel for WHDN-CA. The proposed antenna is mounted on the same structure as the WHDN-CA antenna. The existing antenna structure is a rooftop in which the antenna support structure does not extend more than 20 feet above the top of the roof. Therefore, no Antenna Structure Registration is required for this building.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in structure height is has been made, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radiofrequency Electromagnetic Field – Rooftop

The antenna is located on top of an existing building. This location is an established managed multiuser communications site with rooftop access restricted to site workers and other maintenance personnel. The rooftop is not accessible to the general public and access is restricted by a log entry process to prevent anyone from unknowingly entering a potentially hazardous area. Warning signs will continue to be posted, and *Mr. Marksteiner* will cease transmission as necessary during maintenance to prevent harmful exposure. The general public at ground level and inside the building are shielded from RF exposure by the rooftop itself.

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Human Exposure to Radiofrequency Electromagnetic Field – Ground Level

This operation was evaluated for human exposure to radiofrequency electromagnetic field using the procedures outlined in the Commission’s OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The Channel 26 antenna has a center of radiation of 69 meters above ground level. An effective radiated power of 15 kilowatts, circularly polarized, will be employed utilizing the custom directional antenna described in the Construction Permit. Based on information provided by the antenna manufacturer, the antenna has a maximum vertical plane (elevation) relative field of 15.9 percent or less from 30 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 15.9 percent relative field is used for this calculation. The “general population/uncontrolled” limit specified in §1.1310 for Channel 26 (center frequency 545 MHz) is 363.3 $\mu\text{W}/\text{cm}^2$.

OET 65’s formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET 65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

- S = power density in microwatts/cm²
- ERP = total (average) ERP in Watts
- F = relative field value
- D = distance in meters

Using this formula, this facility would contribute a power density of 5.6 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 1.54 percent of the general

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population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of the any other facilities using this site may be considered independently from this proposal. Accordingly, it is believed that the impact of this facility operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to this facility will not be caused at accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, site access will continue to be restricted and controlled through the use of the current log entry process. Additionally, appropriate RF exposure warning signs will continue to be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower or on nearby towers in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. *Mr. Marksteiner* will coordinate exposure procedures with all pertinent stations.

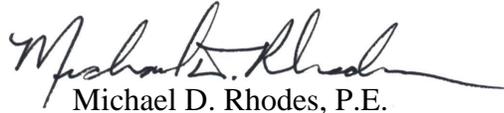
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Conclusion

Based on the preceding, it is believed that the instant facility may be categorically excluded from environmental processing under §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.

Certification

This statement, associated exhibits, and the technical portions of the FCC Form 2100 were prepared by the undersigned and are true and correct to the best of my knowledge and belief.


Michael D. Rhodes, P.E.
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