

K21CX-D, Tucson, Arizona  
Facility ID# 71623  
25 April, 2017

Environmental Statement:

The proposed construction is not a major environmental action as defined by 47CFR1306 and 1307. No new ground construction or lighting changes are involved and no structure heights or widths are being increased.

RF exposure summary:

The tower is surrounded by a high locked fence with numerous RF warning signs to prevent public access to the tower and warn contractors and workers. The proposed construction is on an existing registered broadcast tower, and the tower owner has procedures in place requiring power reductions or shutdowns as needed for crews working on the tower. The public does have ready access to the area outside the fence.

The existing and proposed K21CX-D antenna center is at 50 meters AGL. The proposed horizontal ERP of 9.2 kW with 30% vertical totals 12.70 kW. Using the general exposure formula  $S = (.256)(1.64)(100)(F2) (ERP)/4\pi R^2$ , with a worst case antenna factor of 1.0 yields a power density at ground level of 16.97  $\mu\text{watts/cm}^2$ , far below the occupational limit for channel 35 of 1997  $\mu\text{watts/cm}^2$  and the public exposure limit of 399  $\mu\text{watts/cm}^2$ . Thus the proposed construction would contribute an insignificant amount of RF energy at the level of a person standing on the ground. The existing K21CX-D signal on channel 21 will also be terminated in this process further indicating the proposed will cause a negligible increase in RF levels around the site.

An information sign at the site lists contact information a crew can use to have K21CX-D emissions reduced or terminated to protect tower crews working in the vicinity of the antenna. These facts clearly demonstrate that this application does not present any significant environmental action or hazard as defined in the FCC Rules and Regulations Part 1 and outlined in OET bulletin 65 & 65a.