

HUMAN EXPOSURE TO RADIOFREQUENCY (“RF”) ELECTROMAGNETIC FIELDS COMPLIANCE STATEMENT PREPARED BY WILLIAM T. GODFEY, JR. OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC. (“KGA”), TELECOMMUNICATIONS CONSULTING ENGINEERS IN CONNECTION WITH A CONSTRUCTION PERMIT APPLICATION FOR A NEW CHANNEL 34 POST-AUCTION AUXILIARY FACILITY.

ENVIRONMENTAL IMPACT

The proposed WSLs-DT Channel 34 post-auction auxiliary facility will have no significant environmental impact as defined in §1.1307 of the FCC Rules. The digital transmitter, transmission line and antenna system shall produce a horizontally polarized ERP of 210 kW and a vertically polarized ERP of 69.3 kW (E-pol). It was determined that the maximum lobe of radiation will occur at 78.1 feet from the base of the tower (151.7 ft radial distance from the antenna center). At 78.1 feet from the base of the tower, the depression angle of the main lobe will be approximately 59° below the horizontal. At that point, the relative field is 0.169 and the power density six feet above the ground will be 0.12473 mW/cm². This equates to only 6.31% of the Maximum Permissible Exposure (MPE) limits for Occupational/Controlled Exposure and only 31.55% of the MPE limits for General Population/Uncontrolled Exposure authorized by the American National Standards Institute (ANSI). Since operation of the proposed WSLs-DT Channel 34 auxiliary facility would exceed 5.0% of the MPE limit for General Population/Uncontrolled Exposure on the ground, the WSLs-DT Channel 34 post-auction auxiliary facility is considered a “contributor” to the RF exposure environment pursuant to OET Bulletin 65, Edition 97-01. Therefore, all broadcast antennas on the WSLs tower must be analyzed and a composite study must be calculated to demonstrate that the total power density of all broadcast antennas mounted on the WSLs tower will not exceed 100% of the MPE allowable.

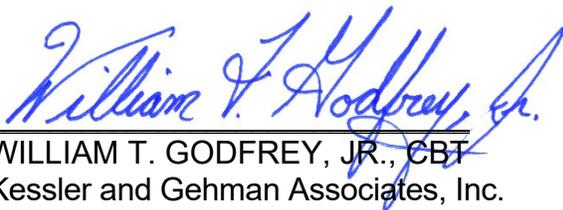
Since the only broadcast antennas mounted on the WSLs support structure are the WSLs-DT main and auxiliary antennas, the composite power density on the support structure is equal to the power density produced by the WSLs-DT auxiliary facility since the main and auxiliary facilities cannot operate simultaneously. Therefore, the total

composite RF energy equates to 6.31% of the MPE limits for Occupational/Controlled Exposure and 31.55% of the MPE limits for General Population/Uncontrolled Exposure. Accordingly, the total exposure, which is generated by the WSLS-DT facility alone, will result in exposure levels well below the allowable exposure threshold authorized by the ANSI and the FCC. Accordingly, it is safe to conclude that the emissions will be insignificant and well within the maximum allowable requirements.

If other antennas are placed on the tower in the future, the licensee will cooperate with those users by reducing or completely terminating the power to the antenna when maintenance workers are in danger from the electromagnetic radiation emanating from the antenna. It is also understood that additional antennas on the support structure could increase the overall RF exposure levels and it is the responsibility of each licensee to ensure that the total RF exposure resulting from the operation of all antennas on the support structure do not exceed the MPE level at any point on the ground.

CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

A handwritten signature in blue ink that reads 'William T. Godfrey, Jr.' with a stylized flourish at the end.

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