

Environmental Protection

The proposed facility will be built at an existing communications facility. This site is not an "Historic Place" as described in section 1.1307(a) (4). Therefore, this application is excluded from the preparation of an "Environmental Assessment" pursuant to Section 1.1306 Note 1.

In order to comply with OET 65, EMF carefully investigated RF sources on the site, and learned that the site is not straightforward. There are multiple towers and multiple radiators on each tower. The proposed modification to KFDN is to be built on a tower that, according to FCC records is within 200 meters of a number of broadcast facilities and applications:

Call	File #	FIN	City of License	Licensee
KARQ	BLED-20081003ADX	52246	San Luis Obispo, CA	Educational Media Foundation
KLFF	BMLED-20161021ABY	38281	San Luis Obispo, CA	Family Life Broadcasting
KCBX	BLED-19890317KD	33705	San Luis Obispo, CA	KCBX, INC
K214ET	BLFT-20110517ADY	77025	San Luis Obispo, CA	Calvary Chapel of Twin Falls
KCPR	BLED-20071017AGL	8324	San Luis Obispo, CA	KCPR-FM
KKAL	BLH-19961226KA	64343	Paso Robles, CA	AGM California, INC
K225BQ	BLFT-20160425AAE	141268	Santa Margarita, CA	Radio Bilingue
KZOZ	BLH-19961226KC	36025	San Luis Obispo, CA	AGM California, INC
K229AK	BLFT-20130502ABO	144956	Baywood-Los Osos, CA	First Ventures Capital Partners
KPYG-FM1	BLFTB-20160405AAL	164769	San Luis Obispo, CA	Dimes Media Corporation
K243CL	BLFT-20161104AAV	138838	San Luis Obispo, CA	AGM California
KKJG	BLH-19970324KG	71713	San Luis Obispo, CA	AGM California
K253BR	BLFT-20151119AAR	156138	San Luis Obispo, CA	Dimes Media Corporation
KESC	BMLED-20090612AFC	58653	Morro Bay, CA	University of Southern California
KERW	BMLED-20160809AAI	63523	Los Osos-Baywood, CA	Santa Monica Community
NEW	BNPFT-20180129AFV	202793	San Luis Obispo, CA	Pacific Coast Media
KSTT-FM	BLH-20021017AAU	42066	Atascadero, CA	AGM California
KWWV	BLH-20021018AAC	25960	Santa Margarita, CA	Dimes Media Corporation
KMLM-FM	BLH-19980312KC	54364	Grover Beach, CA	Gold Coast Radio
K299BE	BLFT-20120601AKQ	94144	San Luis Obispo, CA	Spirit Communications

Because of this large number of facilities and the complexities of calculations with multiple radiators on multiple towers, EMF believes that theoretical calculations would give inaccurate results at best.

Accordingly, EMF respectfully requests that the Commission grant the instant Construction Permit with the condition that EMF make RF measurements before constructing the facility and submit the results of those measurements, along with the theoretical change caused by the addition of its antenna, prior to Commission grant of Program Test Authority.

If the results of the measurements and subsequent calculations reveal that there are areas that would exceed the requirements of OET 65 for controlled or uncontrolled access, EMF will work with the site owners and other broadcasters to erect fencing and/or signage to fully comply with OET 65.

Further, after construction of the instant facility, EMF will continue to cooperate with other site users to reduce power or cease broadcasting as necessary to protect workers and others having access to the site from excessive levels of RF Radiation.