

TECHNICAL STATEMENT
CONCERNING HUMAN EXPOSURE TO RF ELECTROMAGNETIC ENERGY
PREPARED FOR
TELEVISION STATION WECN-DT
NARANJITO, PUERTO RICO
CHANNEL 18

This Technical Statement was prepared on behalf of television station WECN-DT concerning an evaluation of compliance with Section 1.1307(b) of the FCC Rules* regarding human exposure to radio frequency (RF) energy† for its post-transition digital television facility WECN-DT, Naranjito, Puerto Rico (Channel 18).

The WECN-DT facility is to employ a new directional transmitting antenna, which will be mounted in the existing WECN(TV) antenna aperture on its existing 48-m tower supporting structure located near Naranjito, PR. The following table summarizes the facilities considered and the technical details and assumptions made in this analysis:

Call Sign / Mode	Channel / Frequency	Average Effective Radiated Power (kW)	Antenna Radiation Center Height Above Ground (meters)	Transmitting Antenna Make and Model / Polarization
WECN-DT / digital	18 / 494-500 MHz	23	40	ERI, ALP16M2-HSPR-18 / horizontal

The elevation pattern employed for the above listed antenna is included with the instant application for construction permit (FCC Form 301).

* See Rules of the United States Federal Communications Commission (FCC), generally at Title 47 of the Code of Federal Regulations (Telecommunication).

† See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:

http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf

Based on Section 73.1310 of the FCC Rules, the pertinent maximum permissible exposure (MPE) limit for the subject station is as follows:

Call Sign	Frequency (MHz)	MPE for General Population/Uncontrolled (GP/U) Exposure (uW/cm ²)	MPE for <u>5% Exclusion Level</u> for GP/U Exposure (uW/cm ²)
WECN-DT	497	331.3	16.6

Also indicated in the table above is the 5% MPE level below which RF energy level contributions are considered to be negligible. Those licensees whose transmitters produce RF energy levels in excess of 5% of the applicable exposure limit at an accessible location are considered to be significant contributors and would share in the responsibility to bring the RF exposure levels into compliance in a multiple user environment.

The subject facilities were evaluated for RF exposure at 2-m AGL using the procedures outlined in OET Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*[‡], with the following results:

Call Sign	Distance (m)	Assumed Antenna Downward Relative Field Factor [§]	Calculated Power Density (uW/cm ²)	Percent of GP/U MPE (%)
WECN-DT	38	0.25	33.3	10.0

The calculations indicate that the RF field level from WECN-DT as a percent of the GP/U MPE at 2-m above ground level will not exceed 10.0%. This is well below the MPE for general population / uncontrolled environments. Since there are no other broadcast users at or near this location, and the analog operation of WECN(TV) will have

[‡] Federal Communications Commission, Office of Engineering and Technology, OET Bulletin No. 65, Edition 97-01, August, 1997.

[§] This is a conservative estimate of downward relative field factor.

been discontinued on Channel 64, the proposed facility meets the FCC's requirements for human exposure to RF energy.

The transmitter site is restricted from access to the public. All licensees located at the transmitter site shall cooperate in the reduction of power or cessation of operations as necessary to protect persons having access to the tower or antennas from RF radiation in excess of the FCC guidelines.



Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237

February 13, 2008