

Viacom Broadcasting of Seattle Inc., (herein Viacom), the licensee of KSTW-DT Tacoma, WA, proposes to install a dual band antenna, on it's existing tower located at geographic coordinates 47° 36' 56" North Latitude, 122° 18' 29" West Longitude (NAD27), using a directional horizontally polarized antenna, 850 kW average effective radiated power at 275.7 meters antenna radiation center height above average terrain. The proposed antenna radiation center is 185.8 meters above ground level (AGL).

An analysis has been made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition 97-01, prepared by the FCC Office of Engineering and Technology. This analysis was made at a reference point two meters above ground level at the base of the antenna supporting structure. At this reference point a vertical plane relative field factor of .1 for the proposed Dielectric Communications, type TUV-24GTH/8HV-R P220/P190, transmitting antenna was used in the calculation of the KSTW-DT antenna power density.

At the reference point 2 meters AGL at the base of the antenna supporting structure, the calculated KSTW-DT antenna power density does not exceed 5% of the MPE for General Population.

Pursuant to the provisions of OET Bulletin 65, at multiple-user transmitter sites, only those licensees whose transmitters product power density levels in excess of 5.0% of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RF environment in compliance with FCC exposure limits. Since the KSTW-DT operation will contribute less than 5.0% of the most restrictive permissible exposure at any location on the ground at the multiple-user site, KSTW-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of KSTW were not taken into account in this analysis.

However, the KSTW-DT antenna operation will be a “significant contributor” to exposure at locations on the supporting structure near the antenna when it is being operated. If work is done on the tower in an area where over exposure could occur, Viacom will take necessary action to prevent the overexposure of workers on the tower including reducing the KSTW-DT transmitting power or ceasing operation completely. In addition, Viacom will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The KSTW-DT channel 36 antenna facility will utilize an existing supporting structure that is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest.

2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since no change in the existing lighting is proposed.
3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.