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**Engineering Statement**  
**Minor Change Application for WFUN-LP Miami, FL**  
**November 2005**

**NIER Study**

OET Bulletin 65 Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (Edition 97-01) states in part that:

When performing an evaluation for compliance with the FCC's RF guidelines all significant contributors to the ambient RF environment should be considered. . . For purposes of such consideration, significance can be taken to mean any transmitter producing more than 5% of the applicable exposure limit (in terms of power density or the square of the electric or magnetic field strength) at accessible locations.

As will be demonstrated below, the proposed translator operation will produce less than 5% of the applicable exposure limit for both controlled and uncontrolled environments. Thus, the proposed facility is categorically excluded from the requirement of further study. Therefore, pursuant to §1.1307(b)(3) of the Commission's Rules no calculations are required for the other FM and TV facilities in the vicinity, and precise calculations are made only with regard to the levels from this proposal.

Power density levels produced by the proposed WFUN-LP facility were calculated for an elevation of 2 meters above ground (157 meters below the antenna radiation center). The worst case power density levels occur at depression angles between 45 and 90 degrees below the horizontal. The calculations in this report assume a worst-case relative field value of 0.2 at these angles, based on the manufacturer's vertical plane pattern for the Andrew ALP16 antenna proposed in this application. This relative field value yields a worst-case adjusted peak effective radiated power of 6 kW at depression angles between 45 and 90 degrees below the horizontal. Assuming an

average effective radiated power of 3 kW, and the shortest distance between the antenna radiation center and 2 meters above ground level (i.e. straight down), the highest calculated power density from the proposed antenna alone occurs at the base of the antenna support structure. At this point the power density is calculated to be 4.1  $\mu\text{W}/\text{cm}^2$ , which is 1% of 450  $\mu\text{W}/\text{cm}^2$  (the FCC maximum at the Channel 48 visual carrier frequency for uncontrolled environments).

These calculations show that the maximum calculated power density produced at two meters above ground level by the proposed operation alone is less than 5% of the applicable FCC exposure limit at all locations between 1 and 1000 meters from the base of the antenna support structure. Section 1.1307(b)(3) of the Commission's Rules excludes applications for new facilities or modifications to existing facilities from the requirement of preparing an environmental assessment when the calculated emissions from the applicants proposed facility are predicted to be less than 5% of the applicable FCC exposure limit. Therefore, the proposed facility is in compliance with Section 1.1301 et seq and no further analysis of non-ionizing radiation at this site is required in this application.

Pursuant to OET Bulletin No. 65, all station personnel and contractors are required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken. The site and tower will be posted with warning signs.

The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency radiation in excess of FCC guidelines.

November 8, 2005

Erik C. Swanson