

Environmental Compliance  
KDAD  
Douglas WY  
STA request  
October 22, 2007

This proposal has been evaluated with respect to RF radiation exposure guidelines contained in ANSI Standard OET Bulletin 65, edition 97-01, along with Supplement A (Edition 97-01) regarding additional information for Radio and Television Broadcast Stations.

For the FM band, the MPE limit for general population/uncontrolled exposure is  $0.2 \text{ mW/cm}^2$  and the limit for occupational exposure is  $1 \text{ mW/cm}^2$ .

Worst case estimates were used for figures 6 thru 15, supplement A, Section 2. In each case, with a proposed Effective Radiated Power of 1 kW horizontal and vertical (total of 2 kW) at the Center of Radiation of 28 meters above ground (this is minus 2 Meters from the proposed Center of Radiation to allow for the average height of a human on the ground) using a Shively 2 bay, full wave spaced antenna, it was found that the proposed facility was within ANSI limits.

Exhibit 31 *figure 1* of this study shows the results from the FM Model program used by the Commission. It shows the highest power density would be  $1.3 \text{ uW/cm}^2$  at a distance of 18 Meters from the antenna at the ground. This is 0.65% of the MPE limit for uncontrolled exposure.

Where accessible areas of the support structure are within the hazard zone, they will be posted with signs and protected from unauthorized access. If needed, the base of the tower will be surrounded with metal fencing and posted with RF radiation warning signs on the fencing.

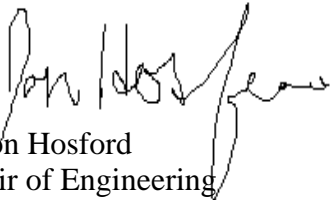
The licensee, White Park Broadcasting certifies that it will cooperate with tower personnel and other users of the tower to either reduce power to safe operating levels, or cease transmissions while maintenance is performed on the tower.

The location of the transmitter site is an existing tower, and does not fall into any of the categories listed in Sections 1.1307(a)(1) through 1.1307(a)(3), and Sections 1.1307(a)(5) through 1.1307(a)(7) of the Commission's Rules; the proposed operation will not involve utilization of high intensity white lights described in Section 1.1307(a)(8) of the Rules.

With respect to conformity with the requirements of Section 1.1307(a)(4) of the Rules, the tower structure will not be located in a recreational area frequented by the public. The proposed location is excluded from environmental processing based on the tentative conclusion that there are no properties of historical significance in the area of potential effects, and that the proposed operation therefore will not have an impact on historical properties.

White Park Broadcasting certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

The applicant assumes full responsibility for remedying the complaints of blanketing interference for a period of one year. Following the one year period of full financial obligation to satisfy blanketing complaints, the licensee shall provide technical assistance to affected persons on remedies for blanketing interference. Since the area inside the blanketing contour is sparsely populated, no serious blanketing interference problems are anticipated.



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Exhibit 31 figure 1

