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NONIONIZING RADIATION COMPLIANCE
Journal Broadcast Corporation
Tucson, AZ

The proposed KGUN-DT maximized post-transition digital facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. This maximized facility will operate with an average maximum effective radiated power of 10.3 kilowatts using the existing Dielectric THV-5A9-R C140 directional antenna which is presently utilized by KGUN for its Channel 9 analog operation. This antenna is located with its center of radiation 67 meters above ground level on an existing 73.2 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (10.3 kilowatts) for the expression $[0.4ERP_v + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Utilizing the vertical pattern data for this antenna from Exhibit 43 in conjunction with this equation yields a predicted worst case maximum power density of $0.83 \mu\text{W}/\text{cm}^2$ at two meters above ground level, which will occur at a depression angle of 67.5° below horizontal. Since the permitted power density for uncontrolled exposure on Channel 9 is $200 \mu\text{W}/\text{cm}^2$, this amounts to only 0.42% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed KGUN-DT post-transition digital facilities are excluded from environmental

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processing under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating compliance with this standard.

KGUN-DT, in conjunction with other co-located and nearby stations, will continue to take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the total power density levels are in excess of the permitted level for controlled exposure.