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RECENT DEER POINT CHRONOLOGY  
NOVEMBER 2001

1. The six FM stations (see drawing) now located on the new master antenna on the newly constructed tower #1 were previously located on towers #2, #3, & #4.
2. One existing TV and three DTV stations share the top of the new tower.
3. All existing stations were licensed based upon those measurements shown on the map that were made in 1999 before construction of tower #1.
4. FM stations on the site were licensed with the understanding that the site was a "Controlled Environment" with warning signs and a fence around the small area where the FCC Controlled Environment MPE was exceeded (see map).
5. Outside of the fenced area there are no locations within the site where the Controlled Environment MPE is, or has been, exceeded on a spatially averaged measured basis.
6. There are poles with warning signs where the measured fields are at the Uncontrolled Environment MPE. The measured fields are below the Uncontrolled Environment outside of the area enclosed by these poles.



James B. Hatfield, P.E.

**FILE COPY**

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January 20, 1999

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Washington, D. C. 20554

Attention: H. John Morgan, Video Services Division, MMB  
Reference: Letter of 12/16/98

Dear Madame Secretary:

This letter has been prepared on behalf of Citicasters Co., licensee of KARO, Caldwell, ID, KLTB, Boise, ID, KCIX, Garden City, ID, and KXLT, Eagle, ID, and Citadel License, Inc., licensee of KIZN, Boise, ID, KQFC, Boise, ID, KKGL, Nampa, ID, and KZMG, New Plymouth, ID. These stations are all among those whose transmitting facilities are located at the Deer Point, Idaho communications site.

Both Citicasters (Jacor) and Citadel (along with the licensees of other facilities at this site) received letters dated December 16, 1998 from H. John Morgan, Assistant Chief of the Video Services Division of the Mass Media Bureau, outlining concerns regarding the circumstances of human exposure to radio-frequency radiation ("NIER") at the Deer Point site. The specifics of the situation were described in detail in a memorandum to MMB which was attached to the Morgan letter from Robert Cleveland and Jerry Ulcek of the Office of Engineering and Technology.

The OET memorandum makes observations and recommendations for compliance in three general respects. The first is regarding the installation of signs "that post the perimeter of the areas where the general population/uncontrolled guidelines are exceeded as described in the Hammett & Edison survey report." Attached to this letter is a copy of the drawing from that report which shows the site and the immediate area. An extensive array of posts with warning signs at two levels above ground has been installed around the entire perimeter described, with the exception of the area of the "approximate boundary" where the terrain is steep and effectively limits access. (It should be noted that the "public limit" boundary shown on this drawing is erroneously based on peak rather than spatially averaged measurements, so that it is a very conservative outer perimeter, which overstates the area where the limits are exceeded.) An extensive series of photographs showing these signs as well as the signs on the site itself has been informally provided to OET personnel over the past few weeks. A description of the signs is contained in the letter of Lee Eichelberger dated December 22, 1998 which is included as an attachment to this letter. They are believed to be fully consistent with the OET recommendation.

The second OET recommendation is "that the small area exceeding the occupational limits mentioned above (primarily around the KIZN FM and KBXL FM tower), and identified in the Hatfield & Dawson report, be fenced and appropriate warning signs be placed on the fence." As noted in an earlier paragraph of the OET memorandum, any fencing at this site is extremely difficult to maintain because of the severe winter weather conditions. Citadel (licensee of KIZN) has recommended to the site user group that such a fence be installed. A fence of the type used to limit access to certain parts of the adjacent ski area may be appropriate, and Citadel is investigating the feasibility of such an installation, as noted in the attached memorandum of January 20 of Ken Broeffle. A drawing showing the approximate location of the proposed fenced area is also attached. The area is now provided with extensive signs, specifically indicating time limits for occupational use of the area, as shown in the attached photographs. Similar signs will be installed on the fence. These actions should fully satisfy OET's second recommendation.

Thirdly, OET requires implementation of a worker training and safety plan. The attached minutes of the Deer Point Users Group show the effort which is being made to implement a master plan for all users of the site, but both Jacor and Citadel are developing individual safety plans for their employees and contractors. Citadel (which, as noted above, is the licensee of KIZN) has ordered an RF safety suit for use on the site by its employees and contractors, and has also begun an analysis of the possibility of replacing the KIZN antenna with a reduced interbay spacing antenna.

The following attachments are included with this letter:

1. "Deer Point RFR Study History" prepared Gary Jamison, Citadel Boise Engineer
2. December 22, 1998 letter of Lee Eichelberger, Jacor Boise Dir. of Engineering
3. Site Map from H & E Report, 1997
4. Site photographs showing sign placement
5. Memorandum of 1/20/99 from Ken Broeffle, Citadel West Dir. of Engineering
6. Map showing proposed fence location
7. Minutes of "Deer Point Users" meetings of 11/5/98 and 12/3/98

Please advise me if further information is required at this time. I anticipate that both Citadel and Jacor will file specific descriptions of the fence installation and of their worker and site user safety plans as soon as they are in place.

Sincerely,



Benj. F. Dawson III, P.E.

BFD/bhs

copy w/encl:

Dr. Robert Cleveland & Mr. Jerry Ulcek, OET  
Mr. Ken Broeffle, Citadel  
Mr. Al Kenyon, Jacor  
Ms. Marissa Repp, Esq. (Counsel to Jacor)  
Ms. Marnie Sarver, Esq. (Counsel to Citadel)  
Mr. Ed Hinshaw, Journal Broadcasting

January 6, 1999

## Deer Point RFR Study History

During the summer of 1996 the local Society of Broadcast Engineers chapter (#115) began discussing the need for an RFR study of the Deer Point site, as FM license renewal was due in 1997. KBOI/KQFC/KLCI (now KKGL and Citadel Communications Corporation) radio general manager Al Vuylsteke offered to be the organizer for this effort.

Bids were put out to Hammett & Edison and Hatfield & Dawson in October of 1996. Both replied by December 6, 1996.

The SBE chapter along with station general managers decided contract with Hammett & Edison do the study, commencing as soon as the road to Deer Point was open.

Due to the hard winter, KLTB-FM, KBSU-FM, KTRV-TV, and KNIN-TV all had severe damage to their antennas, forcing them to use auxiliary facilities or run at greatly reduced power. John Runkel, the site owner of the tower these stations were on, was delayed in making repairs. Thus, the RFR study did not commence until August 11, 1997 a full three months late.

At subsequent meetings, the group decided on the number and placement of RFR signs at the Deer Point site, as outlined in the RFR study results received from Hammett & Edison.

The signs were ordered by KQFC, KLCI (now KKGL), KIZN, and KZMG in November 1997. KLTB, KARO (Jacor) installed the signs (with a contractor) the first weeks of December 1997.

Thirty signs on 15- 16' x 6" x 6" posts were placed at the public limit. Two signs on each post. One at the 12' level, and one at the 5' level.

Three minute RFR occupational limit signs were installed around the KZMG and KIZN/KKGL transmitter buildings and towers in January 1998 by Wireless Broadcast Systems (MMDS and MDS-1) and KARO, KLTB (Jacor).

Additional three and four minute occupational limit and power reduction limit signs were installed around the KBCI-TV/KQFC building and tower by KBCI-TV in the spring of 1998. KQFC had installed ANSI RFR warning signs around the building 1987.

Three and four minute occupational limit and power reduction limit signs were installed around the KIZN and KKBL tower and building in the summer of 1998. ANSI RFR warning signs were in place around the building around 1987.

Buildings that are shielded with some form of screening to reduce RFR exposure are as follows:

WBS (fine mesh copper bonded to ground)  
KTRV-TV  
KCIX/KXLT (½" steel mesh bonded to ground)  
KIVI-TV (steel mesh bonded to ground)  
KBCI-TV/KQFC-FM (½" steel mesh on vertical walls, 1" expanded copper screen on roof.) Including apartment.

We believe that RFR measurements were taken by Hammett & Edison inside the following buildings:

KTRV-TV  
KTVB-TV  
KAID-TV  
WBS (MMDS)

We believe RFR measurements showed no exposure limits were exceed in these buildings.



**jacor**

*The noise you can't ignore.*

December 22, 1998

Ben Dawson  
Hatfield & Dawson  
9500 Greenwood Avenue N.  
Seattle, WA 98103

Dear Mr. Dawson:

As per instructions in a FAX I received from Al Kenyon, Jacor VP Engineering, and further instructions from a phone call to your office yesterday, I am enclosing pictures and descriptions of the RFR signage at the Deer Point transmitter site. Jacor FM transmitter/antenna installations for KCIX-FM, KXLT-FM, KARO-FM and KLTB-FM are located at this site along with several other FM and TV installations. For further reference, it is my understanding that Jim Hatfield has a copy of a Hammet & Edison RF study of the site that gives a complete description of the Deer Point site.

Signs were placed at the public limit perimeter as described in the Hammet & Edison report dated September 24, 1997. Signs were not placed in the area labeled "Boundary Approximate in this Area" or for about 150' south of that area due to the steepness of the terrain. The rest of the perimeter has a post 12' above ground level every 50'. Each post has a minimum of two signs on it, one centered at the 6' level and the other at the top of the post. Two signs were used in order that at least one sign would be visible under all but the most unusual snow conditions. These signs were in place as of mid-December 1997. Two additional signs were placed early January 1998 on the west side of the tower labeled "C" in the Hammet & Edison site map. A copy of the sign wording is included with this letter.

The possibility of a rope around the site has been discussed at Deer Point users meetings and the site users are firmly opposed to any rope. Any rope will, with changes in snow depth, be at neck level sometime during the year. With visibility problems, especially during the winter, the rope would be difficult to see when snowmobiling to the site.

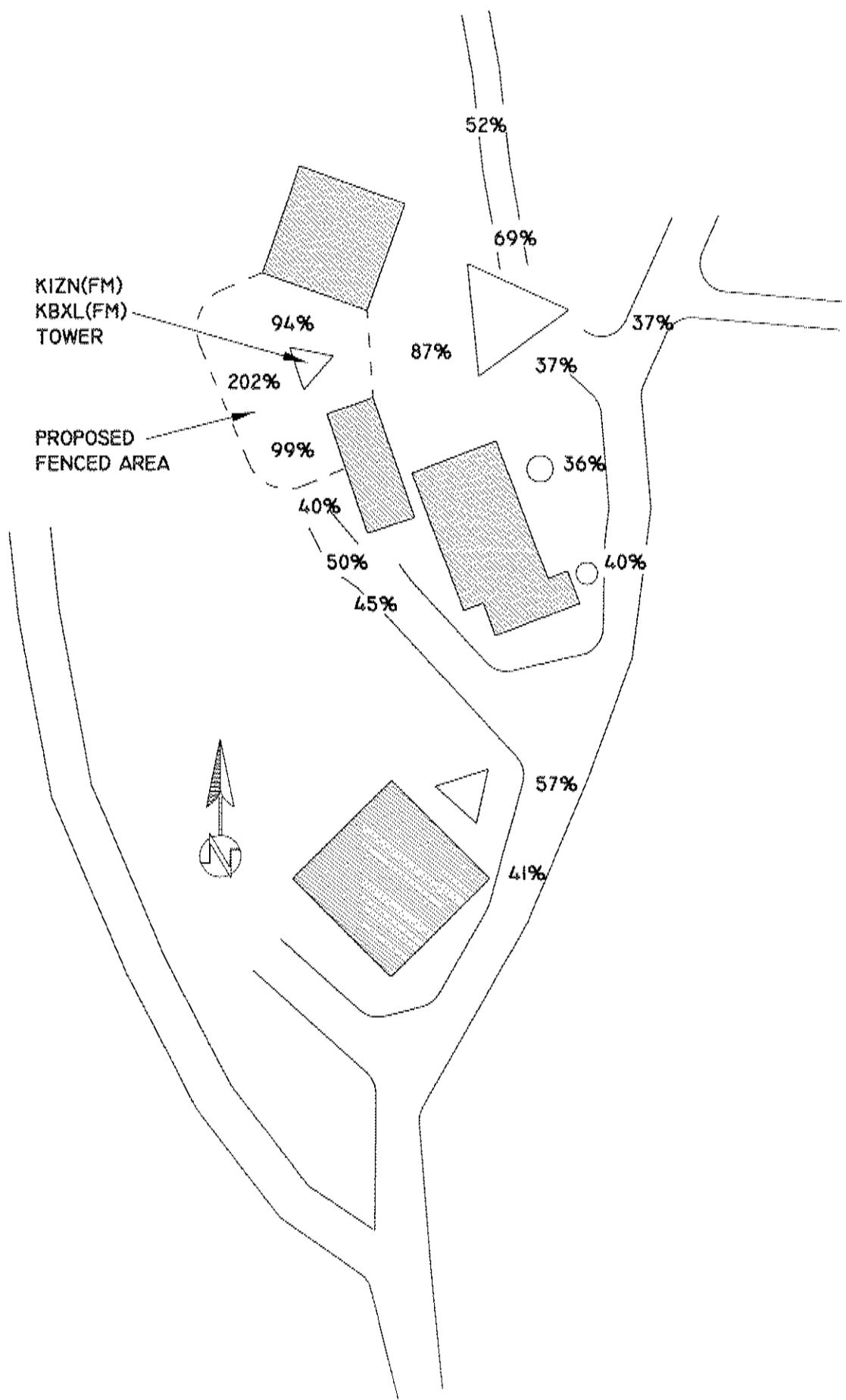
Two additional signs were added in early December 1998. These signs are mounted on the two posts closest to the top of the Bogus Basin #1 (Deer Point) chair lift. The wording of these signs is shown in picture #16. I personally think the wording is very poor in describing the hazard.

I have included a separate page with further information about some of the pictures.

Sincerely,

Lee Eichelberger, DOE Jacor Boise

Enclosures

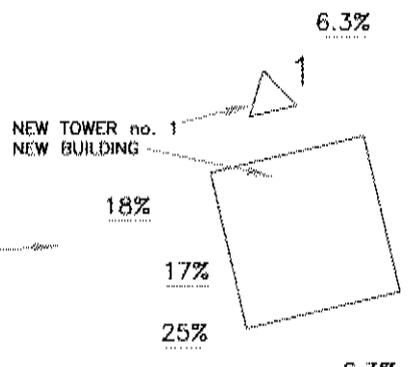


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PROPOSED FENCE LOCATION  
DEERPOINT, IDAHO      ANTENNA SITE  
PREPARED FOR JACOR, INC. & CITADEL LICENSE CORP.      1/99

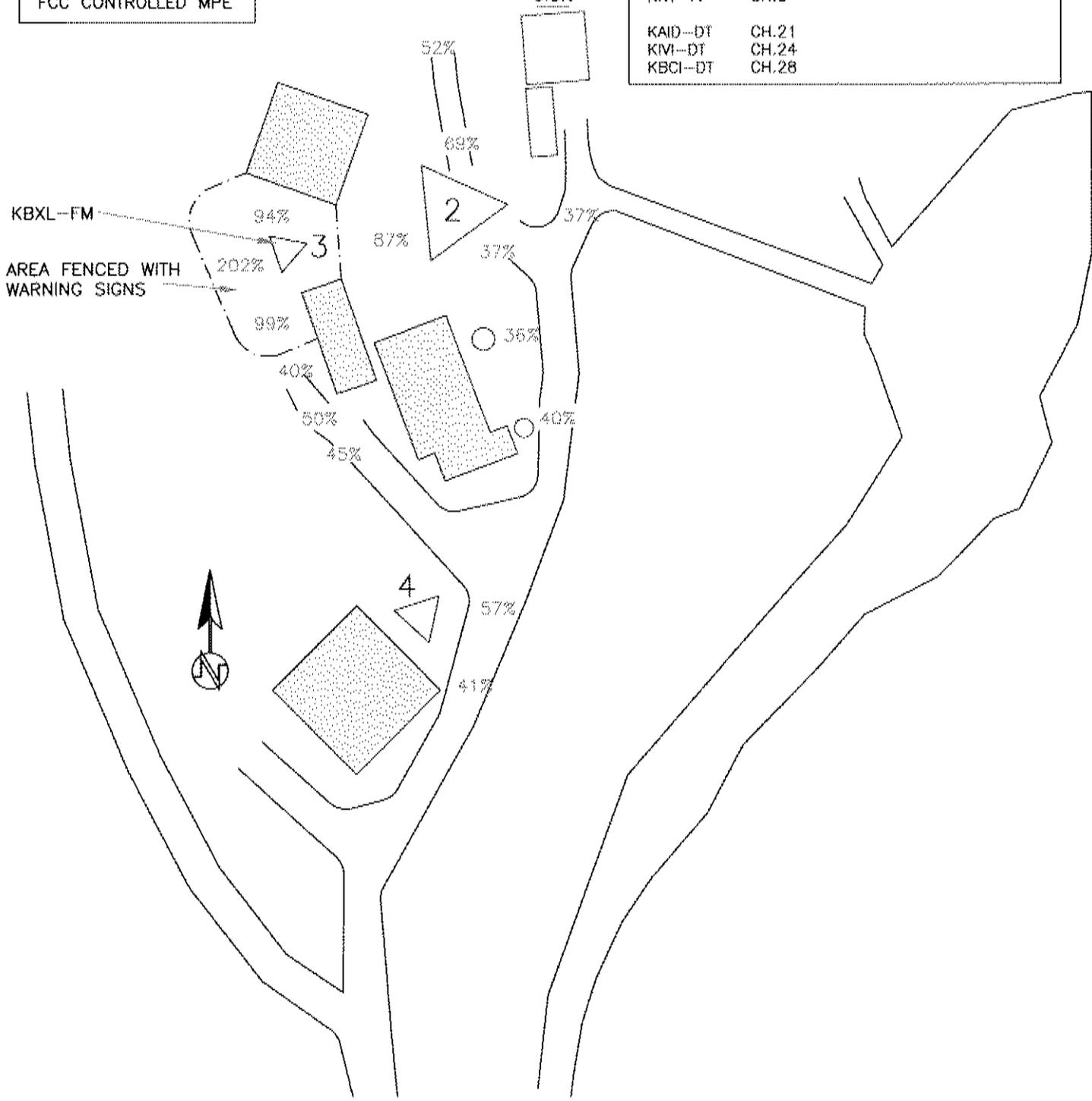
UNDERLINED VALUES ARE READINGS TAKEN ON: OCT 25 2001  
 ALL OTHER READINGS WERE TAKEN IN JAN 1999  
 BEFORE TOWER 1 WAS ERECTED

READINGS SHOW PERCENTAGE OF FCC CONTROLLED MPE



STATIONS ON NEW MASTER ANTENNA ON TOWER no.1		TOWER LOCATION PREVIOUS TO ERECTION OF TOWER no.1
KBSU-FM	90.3	2
KBSX-FM	91.5	2
KIZN-FM	92.3	3
KZMG-FM	93.1	2
KKGL-FM	96.9	2
KQFC-FM	97.9	4

OTHER FACILITIES ON TOWER no.1	
KIVI-TV	CH.6
KAID-DT	CH.21
KVI-DT	CH.24
KBCI-DT	CH.28



HATFIELD & DAWSON  
 CONSULTING ENGINEERS

DEER POINT TRANSMITTER SITE

PREPARED FOR CITADEL COMMUNICATIONS 11/2001