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RFR Statement
Auxiliary FM Antenna on Pantops Water Tower

This Engineering Statement has been prepared on behalf of QueenB Radio, Inc. ("QueenB"). QueenB is the licensee of four FM stations which hold construction permits for operation of auxiliary antenna facilities from the Pantops water tower. The stations and associated construction permits are as follows:

Callsign	Channel	Community	FCC File No.
KXLY-FM	260C	Spokane	BXPH-20061221ABW
KEZE	245C2	Spokane	BXPH-20061221ABG
KHTQ	233C	Hayden	BXPH-20061221ABE
KZZU-FM	225C	Spokane	BXPH-20061221ABN

Each of these construction permits bears a condition requiring post-construction RF field strength measurements "on the roof and throughout the building" to determine whether there are any areas that exceed the FCC guidelines for human exposure to RF fields.[1]

It was demonstrated in the Form 301 applications that the maximum calculated power density at ground level was less than 5% of the FCC standard for uncontrolled areas. The facility was installed as authorized, so no further consideration of ground-level exposure is necessary. Furthermore, given the nature of the installation and the strict access restrictions in place it is not believed that RF field strength exposure measurements are necessary in this particular case.

A single frequency-agile transmitter is being utilized for this installation. Only one station will use this facility at a time, when in fact the facility is being used at all. This fact is noted on the construction permits.

The auxiliary transmitting antenna is installed on a 52-foot tall water tower. According to information provided to this firm by Tim Anderson, Director of Engineering for QueenB, the only access to the top or side of the water tower is via a climbing ladder which is keyed, locked, and guarded by an infrared sensor system. The ladder is located on the opposite side of the water

[1] Since the support structure is a water tower and not an occupied building, the language of the condition relating to exposure levels "throughout the building" is inapplicable.

tower from the FM auxiliary transmitting antenna. There are no catwalks at intermediate heights on the water tower, and so the only means of approaching the antenna would be from the roof of the structure.

The ladder access panel is marked with an RF warning sign. Furthermore, a sign posted at the access panel exhorts individuals requiring access to the structure to “Call Before Climbing!!!”, lists the callsigns of the FM stations, and provides four separate phone numbers for QueenB offices and engineering personnel who can be called to ensure that the auxiliary facility is not transmitting. In addition, there is a written agreement in place between QueenB and the water district requiring notification of the other party in case of need of access for maintenance.

It is believed that these measures are sufficient to ensure that no individual requiring access to the top of the water tower will be exposed to radio frequency radiation in excess of the applicable FCC standard.

September 12, 2008

Erik C. Swanson, P.E.

Photo of the locked panel preventing unauthorized persons from accessing the climbing ladder on the water tower.