



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN  
APPLICATION FOR MODIFICATION OF LICENSE  
WKLZ-FM, PETOSKEY, MICHIGAN  
LIC: CHANNEL 255C1, 52 kW ERP, 244 M HAAT  
APP: CH CHANNEL 255C1, 100 kW ERP, 245 M HAAT  
FACILITY ID # 49590**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Northern Radio of Petoskey, Inc., licensee of WKLZ-FM, Petoskey, Michigan, to prepare this statement and Section III of FCC Form 302-FM in support of an Application for Modification of License to increase Effective Radiated Power (ERP) pursuant to the FCC's, December 8, 1997, Public Notice entitled, "Mass Media Bureau Lists Commercial FM Broadcast Stations Potentially Eligible to Increase Effective Radiated Power on Form 302-FM" (DA 97-2568).

Radio station WKLZ-FM is presently licensed to operate on Channel 255C1 with an ERP of 52 kW at an antenna height above average terrain (HAAT) of 244 meters pursuant to FCC License Number BLH-19910919KC. The authorized WKLZ-FM transmitter site satisfies the spacing requirements contained in Section 73.207 of the FCC Rules. Consequently, WKLZ-FM is listed in the DA 97-2568 Public Notice on Page 8 of the "List of Fully Spaced FM Facilities Able to Increase Power". This application requests an increase in the WKLZ-FM ERP to 100 kW, the maximum permitted for a Class C1 station. The facility change reported herein is permitted without the filing of an Application for

Construction Permit (FCC Form 301) pursuant to the above referenced Public Notice and the FCC Form 302-FM, General Instructions, Part A, Item 6.

The WKLZ-FM allotment is currently an international Class C1 allotment with respect to Canada. The station is not located in or near a radio quiet zone, radio coordination zone, or a Commission monitoring station. Radio station WKLZ is currently home to the Traverse City-Petoskey, MI, Arbitron Metro. The increase in ERP will not require consideration of a multiple ownership showing pursuant to Section 73.3555 of the FCC rules because WKLZ will remain home to the Traverse City-Petoskey, MI, Arbitron Metro.

The applicant installed a new 8-bay, full wavelength spaced, antenna, a new transmission line and a new transmitter to achieve the increase in ERP. The installation of the new antenna resulted in a 1 meter increase in the WKLZ(FM) authorized antenna height. This is a permissible change pursuant to Section 73.1690(c)(1) of the FCC Rules.

Technical data describing the antenna system and the installation is set forth in the attached FCC Form 302-FM.

#### RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted its current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. These guidelines are generally based on recommendations by the National Council on Radiation Protection and

Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, Inc. (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The FCC guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations as well as "uncontrolled" situations that apply in cases that affect the general public. The FCC's Office of Engineering and Technology (OET) Commission issued a revised technical bulletin (OET Bulletin No. 65) entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (Edition 97-01, August 1997) to aid in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency electromagnetic fields as adopted by the Commission in 1996. The revised Bulletin contains technical information for evaluating compliance with the FCC policies and guidelines.

The FCC MPE level for "uncontrolled" environments is 0.2 milliwatt per centimeter squared ( $\text{mW}/\text{cm}^2$ ) for FM facilities. The MPE level for FM facilities in a "controlled" environment is  $1.0 \text{ mW}/\text{cm}^2$ .

The proposed WKLZ-FM facility will operate with an ERP of 100.0 kW from a circularly polarized, 8-bay, full wavelength spaced, ERI Rototiller type, non-directional transmitting antenna with a centerline height of 109 meters above ground level (AGL). Based on the FCC's FM model program which considers the specific transmitting antenna type and computes the predicted power density of a given station, WKLZ-FM is predicted

to produce a maximum power density at two meters above ground level of 0.034 mW/cm<sup>2</sup> which is 17% of the FCC guideline value for “uncontrolled” environments.

#### OCCUPATIONAL SAFETY


Based on the calculations discussed above, WKLZ-FM produces a predicted power density at two meters above ground level which is only 3.4% of the FCC guideline value for “controlled” or occupational RFR environments. Radio station WKLZ-FM will insure the protection of station personnel or tower contractors working in the vicinity of the transmitting antenna. WKLZ-FM will reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel.

In light of the above, WKLZ-FM should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

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This statement and Section III of FCC Form 302-FM were prepared by me, or under my direct supervision, and are believed to be true and correct.

DATED: October 13, 2004

  
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William J. Getz