Educational Media Foundation
5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Compliance with OET 65

The proposed facility is located on an existing communications site with a large number of full-power radio stations located on several towers. Educational Media Foundation ("EMF") is proposing to change ERP from 10 watts to 250 watts. As can be seen in Exhibit 16A, the change between the two facilities is negligible, going from a maximum of 0.1209 mW/cm^2 at 40 meters from the tower to a maximum of 6.6071 mW/cm^2 at 11 meters from the tower (since EMF proposes to change from a non-directional circular antenna to a directional "cross-pole" antenna, and OET 65 does not have a directly comparable model, the "after" calculations were done using the "worst-case" dipole model. The actual values will likely be less). The highest "after" value is 3.3% of the uncontrolled/public exposure limits of the Commission's rules.

If the Commission desires, EMF will perform field measurements before and after the changes to confirm that EMF's contribution to the overall RF on the site is negligible. If, however, it is determined that EMF's changes have caused some locations to exceed the limits specified in OET 65 for controlled or uncontrolled exposure, EMF will take all necessary measures, such as installing signage and/or fencing to ensure both the public and workers with access to the site are protected from RF exposure in excess of OET 65 guidelines.

Further, EMF will cooperate with other uses of the site to 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.

Exhibit 16A: RF Analysis: Boise ID 206D/260D

	Originally Proposed	Current Proposal
Site type:	Translator	Translator
Channel:	206	260
Class:	D	D
ERP:	0.010	0.250

	Originally Proposed	Current Proposal
Antenna:	SWR Double-V 1-bay full-wave	Scala CA2-CP (dipole) 1-bay full-wave
COR AGL:	39m	39m

Distance From Tower (m)	Originally Proposed Facility	This Proposal	Original Total RF (uW/cm2)	Original Percent of 200uW/cm2	Proposed Total RF (uW/cm2)	Proposed Percent of 200uW/cm2	Change in % of 200uW/cm2
0	0.0308	5.4914	0.0308	0.02	5.4914	2.75	2.73
1	0.0313	5.5834	0.0313	0.02	5.5834	2.79	2.78
2	0.0319	5.6687	0.0319	0.02	5.6687	2.83	2.82
3	0.0324	5.7467	0.0324	0.02	5.7467	2.87	2.86
4	0.0344	5.9048	0.0344	0.02	5.9048	2.95	2.94
5	0.0372	6.1179	0.0372	0.02	6.1179	3.06	3.04
6	0.0401	6.3237	0.0401	0.02	6.3237	3.16	3.14
7	0.0430	6.5033	0.0430	0.02	6.5033	3.25	3.23
8	0.0465	6.5450	0.0465	0.02	6.5450	3.27	3.25
9	0.0501	6.5778	0.0501	0.03	6.5778	3.29	3.26
10	0.0537	6.6016	0.0537	0.03	6.6016	3.30	3.27
11	0.0574	**6.6071**	0.0574	0.03	**6.6071**	**3.30**	**3.27**
12	0.0613	6.5966	0.0613	0.03	6.5966	3.30	3.27
13	0.0652	6.5782	0.0652	0.03	6.5782	3.29	3.26
14	0.0691	6.5521	0.0691	0.03	6.5521	3.28	3.24
15	0.0732	6.5559	0.0732	0.04	6.5559	3.28	3.24
16	0.0774	6.5601	0.0774	0.04	6.5601	3.28	3.24
17	0.0816	6.5558	0.0816	0.04	6.5558	3.28	3.24
18	0.0858	6.5435	0.0858	0.04	6.5435	3.27	3.23
19	0.0891	6.4690	0.0891	0.04	6.4690	3.23	3.19
20	0.0921	6.3781	0.0921	0.05	6.3781	3.19	3.14
21	0.0949	6.2841	0.0949	0.05	6.2841	3.14	3.09
22	0.0976	6.1875	0.0976	0.05	6.1875	3.09	3.04
23	0.1002	6.1049	0.1002	0.05	6.1049	3.05	3.00
24	0.1029	6.0363	0.1029	0.05	6.0363	3.02	2.97
25	0.1054	5.9639	0.1054	0.05	5.9639	2.98	2.93
26	0.1077	5.8883	0.1077	0.05	5.8883	2.94	2.89
27	0.1099	5.8098	0.1099	0.05	5.8098	2.90	2.85
28	0.1112	5.6888	0.1112	0.06	5.6888	2.84	2.79
29	0.1119	5.5512	0.1119	0.06	5.5512	2.78	2.72
30	0.1125	5.4159	0.1125	0.06	5.4159	2.71	2.65
31	0.1130	5.2828	0.1130	0.06	5.2828	2.64	2.58
32	0.1133	5.1523	0.1133	0.06	5.1523	2.58	2.52
33	0.1139	5.0271	0.1139	0.06	5.0271	2.51	2.46
34	0.1155	4.9112	0.1155	0.06	4.9112	2.46	2.40
35	0.1168	4.7975	0.1168	0.06	4.7975	2.40	2.34
36	0.1181	4.6860	0.1181	0.06	4.6860	2.34	2.28
37	0.1191	4.5769	0.1191	0.06	4.5769	2.29	2.23
38	0.1200	4.4701	0.1200	0.06	4.4701	2.24	2.18
39	0.1208	4.3657	0.1208	0.06	4.3657	2.18	2.12
40	**0.1209**	4.2456	**0.1209**	**0.06**	4.2456	2.12	2.06
41	0.1208	4.1297	0.1208	0.06	4.1297	2.06	2.00
42	0.1206	4.0178	0.1206	0.06	4.0178	2.01	1.95
43	0.1204	3.9097	0.1206	0.06	3.9097	1.95	1.89
44	0.1201	3.8054	0.1204	0.06	3.8054	1.90	1.84
45	0.1196	3.7048	0.1201	0.06	3.7048	1.85	1.79

Distance From Tower (m)	Originally Proposed Facility	This Proposal	Original Total RF (uW/cm2)	Original Percent of 200uW/cm2	Proposed Total RF (uW/cm2)	Proposed Percent of 200uW/cm2	Change in % of 200uW/cm2
46	0.1192	3.6075	0.1192	0.06	3.6075	1.80	1.74
47	0.1183	3.5535	0.1183	0.06	3.5535	1.78	1.72
48	0.1172	3.5353	0.1172	0.06	3.5353	1.77	1.71
49	0.1160	3.5151	0.1160	0.06	3.5151	1.76	1.70
50	0.1148	3.4932	0.1148	0.06	3.4932	1.75	1.69
51	0.1136	3.4697	0.1136	0.06	3.4697	1.73	1.68
52	0.1124	3.4448	0.1124	0.06	3.4448	1.72	1.67
53	0.1111	3.4185	0.1111	0.06	3.4185	1.71	1.65
54	0.1099	3.3911	0.1099	0.05	3.3911	1.70	1.64
55	0.1086	3.3627	0.1086	0.05	3.3627	1.68	1.63
56	0.1073	3.3196	0.1073	0.05	3.3196	1.66	1.61
57	0.1059	3.2459	0.1059	0.05	3.2459	1.62	1.57
58	0.1045	3.1742	0.1045	0.05	3.1742	1.59	1.53
59	0.1031	3.1044	0.1031	0.05	3.1044	1.55	1.50
60	0.1018	3.0366	0.1018	0.05	3.0366	1.52	1.47
61	0.1004	2.9706	0.1004	0.05	2.9706	1.49	1.44
62	0.0991	2.9064	0.0991	0.05	2.9064	1.45	1.40
63	0.0977	2.8440	0.0977	0.05	2.8440	1.42	1.37
64	0.0964	2.7833	0.0964	0.05	2.7833	1.39	1.34
65	0.0950	2.7243	0.0950	0.05	2.7243	1.36	1.31
66	0.0937	2.6669	0.0937	0.05	2.6669	1.33	1.29
67	0.0924	2.6110	0.0924	0.05	2.6110	1.31	1.26
68	0.0911	2.5587	0.0911	0.05	2.5587	1.28	1.23
69	0.0898	2.5102	0.0898	0.04	2.5102	1.26	1.21
70	0.0885	2.4629	0.0885	0.04	2.4629	1.23	1.19
71	0.0872	2.4168	0.0872	0.04	2.4168	1.21	1.16
72	0.0859	2.3718	0.0859	0.04	2.3718	1.19	1.14
73	0.0847	2.3279	0.0847	0.04	2.3279	1.16	1.12
74	0.0835	2.2851	0.0835	0.04	2.2851	1.14	1.10
75	0.0823	2.2433	0.0823	0.04	2.2433	1.12	1.08
76	0.0811	2.2026	0.0811	0.04	2.2026	1.10	1.06
77	0.0799	2.1628	0.0799	0.04	2.1628	1.08	1.04
78	0.0787	2.1241	0.0787	0.04	2.1241	1.06	1.02
79	0.0776	2.0862	0.0776	0.04	2.0862	1.04	1.00
80	0.0765	2.0493	0.0765	0.04	2.0493	1.02	0.99
81	0.0754	2.0133	0.0754	0.04	2.0133	1.01	0.97
82	0.0743	1.9781	0.0743	0.04	1.9781	0.99	0.95
83	0.0732	1.9438	0.0732	0.04	1.9438	0.97	0.94
84	0.0722	1.9077	0.0722	0.04	1.9077	0.95	0.92
85	0.0711	1.8683	0.0711	0.04	1.8683	0.93	0.90
86	0.0700	1.8301	0.0700	0.04	1.8301	0.92	0.88
87	0.0690	1.7929	0.0690	0.03	1.7929	0.90	0.86
88	0.0679	1.7568	0.0679	0.03	1.7568	0.88	0.84
89	0.0669	1.7217	0.0669	0.03	1.7217	0.86	0.83
90	0.0659	1.6876	0.0659	0.03	1.6876	0.84	0.81
91	0.0650	1.6545	0.0650	0.03	1.6545	0.83	0.79
92	0.0640	1.6222	0.0640	0.03	1.6222	0.81	0.78
93	0.0631	1.5909	0.0631	0.03	1.5909	0.80	0.76
94	0.0622	1.5604	0.0622	0.03	1.5604	0.78	0.75
95	0.0613	1.5308	0.0613	0.03	1.5308	0.77	0.73
96	0.0604	1.5019	0.0604	0.03	1.5019	0.75	0.72
97	0.0595	1.4738	0.0595	0.03	1.4738	0.74	0.71
98	0.0587	1.4465	0.0587	0.03	1.4465	0.72	0.69
99	0.0579	1.4199	0.0579	0.03	1.4199	0.71	0.68
100	0.0570	1.3939	0.0570	0.03	1.3939	0.70	0.67