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NONIONIZING RADIATION COMPLIANCE  
Journal Broadcast Corporation  
Tucson, AZ

The proposed KZPT facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. The proposed antenna will be mounted at the 215.5 meter level on a proposed new 220.7 meter tower that will be erected immediately adjacent to the tower that supports the antenna for the licensed KZPT facilities and will operate with a circularly polarized effective radiated power of 3 kilowatts. It should be noted that the existing KZPT tower also supports the antennas for KCMT(FM) - Oro Valley, AZ and K285DL - Casas Adobes, AZ. Equation (9), found on Page 22 of FCC OET Bulletin No. 65 details the calculation technique for determining the worst case far field equivalent power density levels for FM broadcast stations. Assuming 100% downward radiation for the proposed KZPT facilities, this equation predicts that the maximum KZPT power density at two meters above ground level will be  $4.4 \mu\text{W}/\text{cm}^2$ . Since the permitted power density for uncontrolled exposure to nonionizing radiation in the FM band is  $200 \mu\text{W}/\text{cm}^2$ , this amounts to only 2.2% of the permitted level. Since this value is less than 5% of the permitted level, the proposed facilities are excluded from environmental processing under this FCC Standard and need not be considered in conjunction with KCMT and K285DL in evaluating compliance with regard to uncontrolled exposure to nonionizing radiation..

KZPT, in conjunction with KCMT and K285DL, will also take the necessary steps to insure that workers that must be on either of these towers 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

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appropriate, by one or more of these stations when work becomes necessary in areas on these towers where the total power density levels will be in excess of the permitted level for controlled exposure.