



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
FOR A NEW FM BOOSTER STATION
TO SERVE WILLIAMSBURG, VIRGINIA
CH 215, 0.025 KW, 38 M HAAT**

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 The College of William and Mary in VA, licensee of noncommercial educational station WCWM(FM), Williamsburg, Virginia, to prepare this Application for Construction Permit seeking authority to construct a new FM booster station to serve the College of William and Mary campus in Williamsburg, Virginia.

Radio station WCWM(FM) currently holds an outstanding FCC construction permit (FCC File No. BPED-20010725AGD) to relocate and change channel from 214A to 215A. Concurrently with the instant booster application, The College of William and Mary is also filing an application to modify the outstanding WCWM(FM) main construction permit (change site and increase power). The FM booster facility proposed herein was designed such that the booster's 60 dBu (1.0 mV/m) contour is wholly within the presently licensed WCWM 60 dBu contour and the 60 dBu contour resulting from the WCWM(FM) main facility proposed in the concurrently filed minor modification of construction permit application.

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Once the concurrently filed WCWM(FM) modification of construction permit application is granted and the facility proposed therein is constructed, the College of William and Mary will use the presently licensed main facility as a booster facility. The booster facility (proposed herein) will operate on the new WCWM(FM) channel (215) at a reduced ERP to comply with Section 74.1231 of the FCC Rules.

As stated above, the WCWM(FM) main facility is presently licensed to operate on Channel 214A. Once the modified WCWM(FM) facility is authorized and operational, WCWM(FM) will operate on Channel 215B1. Because this booster application requests authority to operate on the new Channel 215 (not yet licensed to the primary station) a waiver of Section 73.1202(c) of the FCC Rules is respectfully requested. License applications to cover the WCWM (Channel 215B1) construction permit and the FM Booster construction permit (proposed herein) will be filed simultaneously. The FM booster facility will not commence operation until a license application is filed to cover the WCWM(FM) Channel 215B1 construction permit.

PREDICTED COVERAGE CONTOUR

The predicted 60 dBu (1.0 mV/m) coverage contours of the proposed booster facility and the associated main facility, as presently licensed and as proposed in the concurrently filed minor modification of construction permit application are shown on Exhibit 1. The service contours were calculated in accordance with the method described in Section 73.313 of the FCC Rules utilizing the appropriate F(50,50) propagation curves, effective

radiated power, and antenna height above average terrain as determined for each profile radial.

As required by Section 74.1231 of the FCC rules, the booster's predicted 60 dBu field strength contour is wholly within the 60 dBu protected service contour of the primary station.

FAA NOTIFICATION & TOWER REGISTRATION

The applicant proposes to use the presently licensed WCWM(FM) main antenna as the transmit antenna for the proposed booster station. The WCWM(FM) antenna is pole mounted atop a building on the William & Mary campus. No construction is proposed herein. Because the support pole does not extend beyond 20 feet above the existing building, FAA notification and FCC tower registration is not required.

ENVIRONMENTAL CONSIDERATIONS

GENERAL

The proposal described herein meets the criteria specified in Section 1.1306 of the FCC Rules and Regulations as an action which is categorically excluded from environmental processing. The proposed facility involves neither a site location specified under Section 1.1307(a)(1)-(7) of the Rules, nor high intensity lighting as specified in Section 1.1307(a)(8).

RADIOFREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted the current guidelines and procedures for evaluating environmental effects of radiofrequency emissions. The 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). These 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 has 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 updated and additional technical information for evaluating compliance with FCC policies and guidelines.

The FCC MPE level for FM stations in an "uncontrolled" environment is 0.2 mW/cm². The MPE level for FM stations in a "controlled" environment is 1.0 mW/cm².

The proposed FM booster station will operate with only 25 watts ERP. Presently, the booster antenna serves as the main WCWM(FM) antenna and operates with an ERP of 1.6 kW. Consequently, the resulting power density will substantially decrease as a result

of the instant proposal. Based on a worst-case analysis, the proposed booster station is predicted to produce a maximum power density at two meters above ground level of 0.003 mW/cm², which is only 1.5% of the FCC guideline value for “uncontrolled” environments.

OCCUPATIONAL SAFETY

Considering the calculations discussed above, the proposed FM booster is predicted to produce a power density which is only 0.3% of the FCC guideline value for “controlled” environments at 2 meters above ground level. Further, the applicant will insure the protection of station personnel or tower contractors working in the vicinity of the proposed transmitting antenna. The applicant 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, the proposed FM booster facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

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SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 349, Section II, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: November 12, 2002



William J. Getz