

## EXHIBIT 16

The proposed facility has been analyzed with respect to OET Bulletin 65 Edition 97-01 regarding non-ionizing radiation. A plot of the predicted power density for the proposed operation was produced by the *FM Model for Windows* software provided by the Office of Engineering and Technology.

The directional antenna proposed is similar to the Jampro “Double V” antenna pre-programmed in the software. This model depicts the anticipated exposure levels to a person at ground level. The parameters used for the model are as follows:

Antenna Type:	Jampro “Double V” EPA
Horizontal ERP:	10 watts
Vertical ERP:	10 watts
Antenna Height:	73 meters
Number of Elements:	1
Element Spacing:	1 wavelength (not applicable)

As demonstrated by the plot included in this exhibit, the power density at all locations at ground level are well below the maximum allowable exposure limit for uncontrolled (public) access areas of  $200 \mu\text{W}/\text{cm}^2$ . The power density maxima is  $0.036 \mu\text{W}/\text{cm}^2$  at a distance of 73 meters horizontally from the base of the tower. This represents only 0.018% of the maximum allowable exposure limit for uncontrolled (public) access, a negligible amount.

There exists two other transmitters at the proposed tower site: FM broadcast station WQFM, channel 221A, and translator W288BE. Translator W288BE operates with only 8 watts of effective radiated power at 44 meters above ground, and like the proposed facility, contributes a negligible amount to the total power density at ground level. W288BE operates with a Jampro “Double V” type antenna. The software predicts a worst-case power density of  $0.0834 \mu\text{W}/\text{cm}^2$

at a distance of 43 meters from the tower base. This represents only 0.042% of the maximum allowable exposure limit for uncontrolled (public) access.

WQFM operates with 660 watts effective radiated power, with an antenna center of radiation 83 meters above ground level. WQFM uses a single-bay Jampro “Double V” type antenna as well. The software predicts a worst-case power density of  $1.85 \mu\text{W}/\text{cm}^2$  at a distance of 83 meters from the tower base. This represents only 0.93% of the  $200 \mu\text{W}/\text{cm}^2$  limit for uncontrolled access.

To conclude, the sum-total of the transmitters at the site yields less than 1% of the uncontrolled access exposure limit.

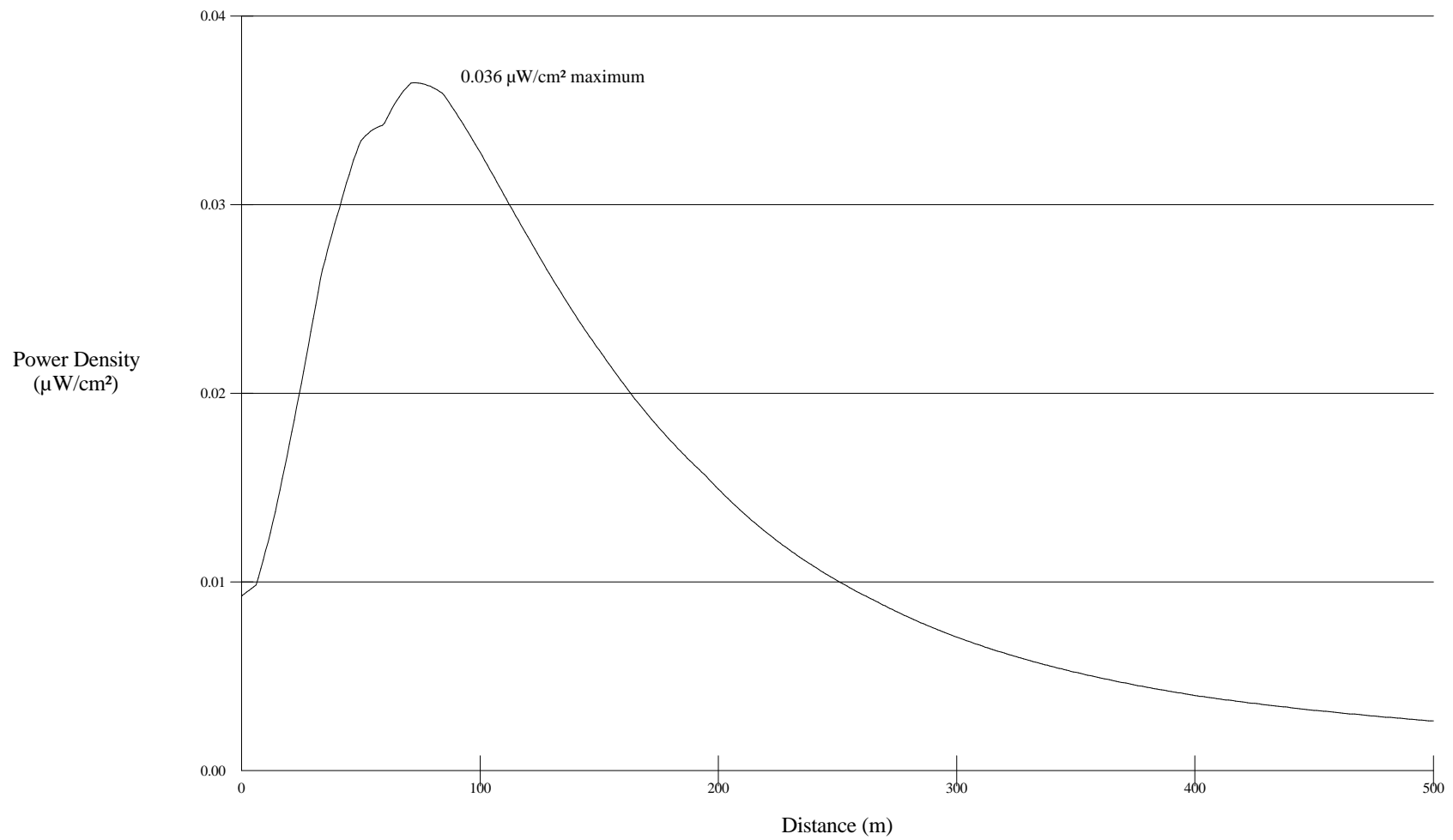
The tower site is protected by a locked chain-link fence to prevent trespassers from accessing the tower or translator equipment. The antenna tower and security fence is marked with signage warning that non-ionizing radiation in excess of the aforementioned limits may be experienced at some locations on the tower. The signage also includes contact information and instructions to workers such that power may be removed from the antenna should a worker require access to areas of power density in excess of the controlled access limits.

Based on the analyses above, it is concluded that the proposed operation is in full compliance with non-ionizing radiation exposure limits.

The proposed facility will have no other significant environmental impact. The antenna tower is existing. The proposed location is not in a sensitive environmental area. The proposed facility does not require further environmental analysis under 47 CFR §1.1307 and is therefore excluded from environmental processing under 47 CFR §1.1306.

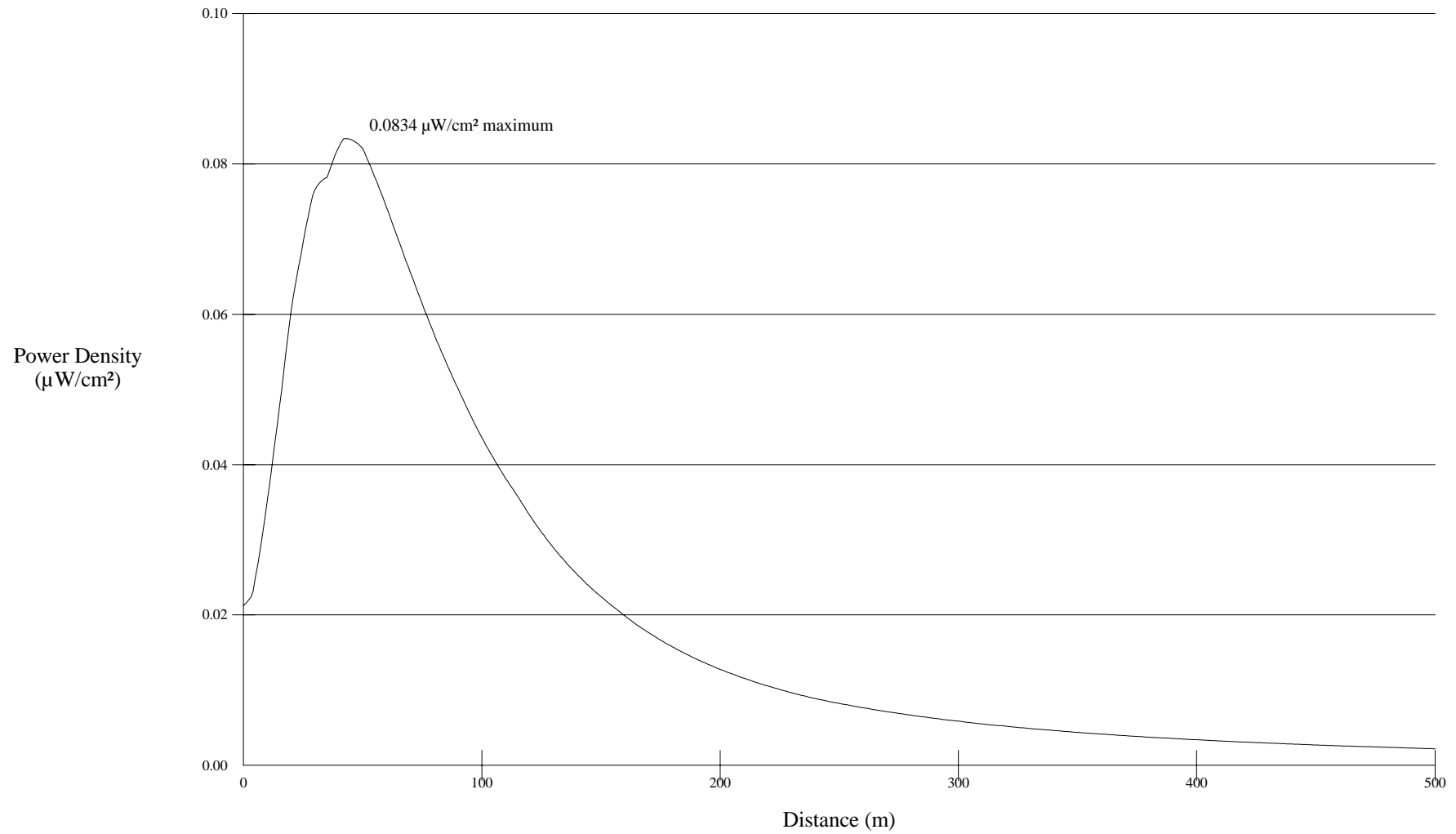
## W235AA - 10 watts V/H, 73m AGL

Power Density vs Distance



# W288BE - 8 watts V/H, 44m AGL

Power Density vs Distance



# WQFM 221A - 660 watts V/H, 83m AGL

## Power Density vs Distance

