ATTACHMENT 8
EXHIBIT 8 - RF COMPLIANCE STATEMENT
K32DY 11 KW-DA 33M AGL CH. 32-
MEDFORD, OREGON

The applicant, California Oregon Broadcasting, Inc. ("COBI"), requests authority to modify the licensed facility of Class A TV station, Channel 32, Medford, OR. Specifically, the applicant proposes to change the license facility for a new directional antenna, an increase in antenna height and a reduction in power. As discussed in detail below, the temporary authorization as modified complies with the Commission's safety standards for human exposure to radio-frequency (RF) energy and therefore remains categorically excluded from environmental processing under Section 1.1306.

The new facilities specified for K32DY involve a maximum ERP of 11 kW at an antenna height of 33 meters AGL. Since the new antenna is designed for 3 degrees electrical beam tilt, the RF exposure calculation for the affected site area was based on the main lobe ERP of 21.7 kW. This antenna is a Scala Model K723147 panel array and it will be tower mounted on a hill top where no significant access by the public is possible near the base of the antenna supporting structure. The antenna radiated field was evaluated using the elevation pattern data supplied by the manufacturer with calculations made in accordance with FCC and ANSI methods. It was assumed that the antenna emissions are undistorted by tower mounting and that the RF signals are projected around the tower as controlled by the antenna horizontal plane directional pattern. A copy of the antenna elevation pattern is provided as Figure 1.

K32DY contributes a portion of the RF exposure at the site or any location nearby, from a multiplicity of users. An analysis of the station based on the proposed operating facilities was conducted and the results demonstrate that the main concentration of ground level exposure occurs at the base of the K32DY tower. The K32DY antenna limits the downward field, at all angles in excess of 30 degrees below the horizontal, to less than 10% of maximum field.

The maximum ground level R.F. exposure value was calculated, based on ERP, height and vertical antenna pattern, and does not exceed 5 uW/cm^2 (microwatts per square centimeter). Lesser exposure levels occur from this facility at greater distances out from the tower base. The proposed K32DY operation contributes far less than 5% of the FCC adopted exposure guideline for uncontrolled environments which is 318 uW/cm^2. Since the estimated “worst case” contribution for the low power facility is less than 5% of the uncontrolled limit, the applicant is not required to further evaluate the antenna location with respect to other RF contributors.

The above calculation demonstrates that the maximum permissible guideline for un-controlled ground level exposure (public limit) is not reached at any ground level location. Moreover, direct access to the antenna supporting structure is controlled by fencing, locked gates, and warning signs and is not available to the public.

Controlled (occupational) exposure will not exceed the FCC adopted guidelines at the base of the tower and for a limited distance above ground level for the purpose of tower climbing. A calculation at elevated positions on the tower indicates that the controlled exposure limit will be reached at elevations within 10 meters of the antenna.

It has been demonstrated that the proposal complies with the occupational exposure guideline at any ground-level location. At higher elevations on the antenna structure, however, workers will be protected from excessive exposure to RF fields in accordance with the methods recommended in *OET Bulletin No. 65, Version 97-01.* COBI will also adopt a work policy for coordinating with other site users. Preventive steps for avoiding excessive exposure may include scheduling work while the facility operates at reduced power or is shut down.

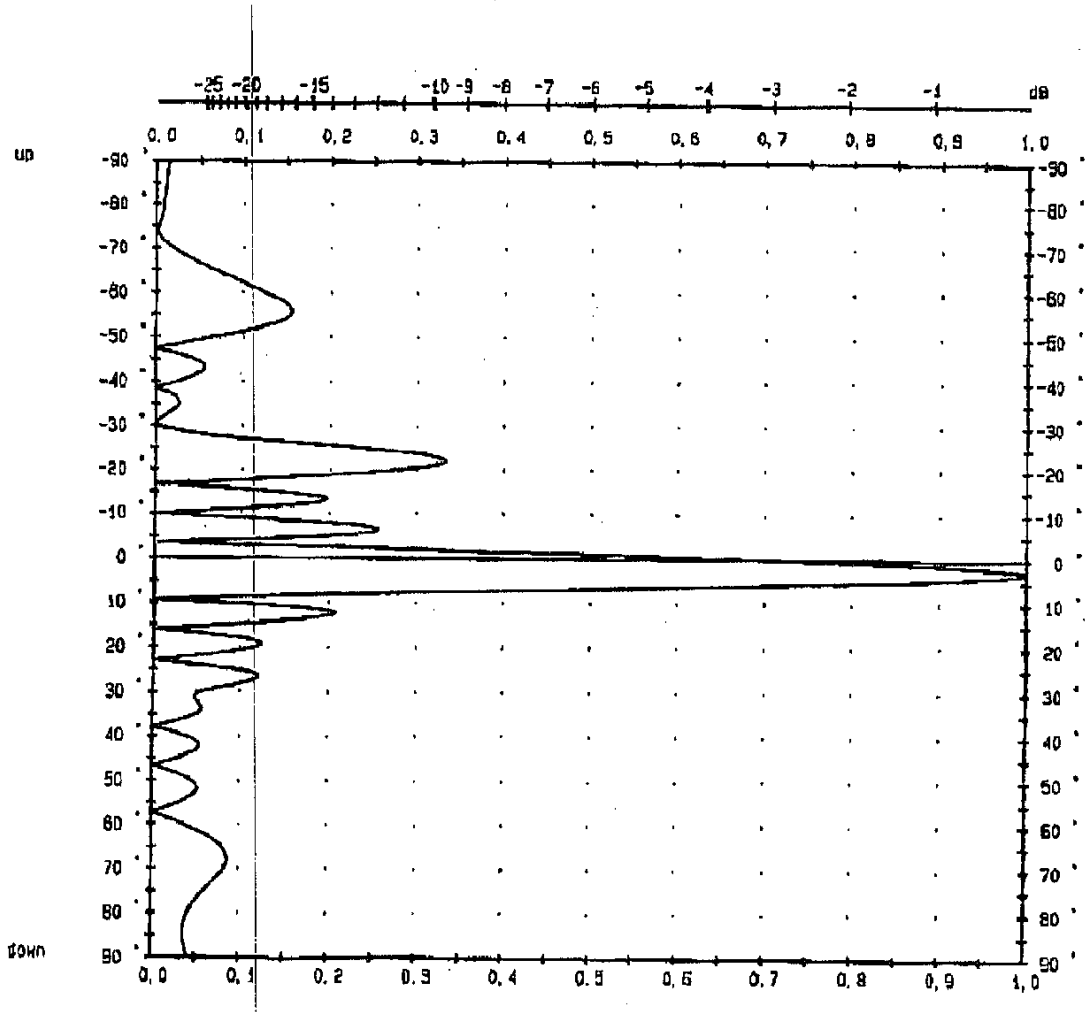
Prepared by

Lohnes and Culver
8309 Cherry Lane
Laurel, MD 20707
301-776-4488

April, 2004

EXHIBIT 8 - FIGURE 1

Mar 03 2004 4:08PM KATHREIN INC [redacted] 5417796575 p.3



frequency in MHz 579.250
azimut in ° 225.0
omni-dir in dBd 9.85

KOBI

SCALA Medford Oregon	4 x 4 K723147 Broadband panel array	Typ Nr.
MB 3.3. 4 16:0	Pattern at Ch-32. 3 deg dt	Bl.: