

Environmental Protection

EMF's proposed facility will be constructed on an existing tower (tower ID 1005472) in an established "antenna farm". The site proposed herein has both registered and unregistered towers on the site. According to 47 C.F.R. Section 1.1306 Note 3, such facilities "will be categorically excluded" from environmental processing except for the RF requirements of Section 1.1307(b).

In order to comply with OET 65, EMF carefully investigated RF sources on the site, and learned that the site is not straightforward. There are multiple towers and multiple radiators on each tower. The proposed modification to KBMK is to be built on a tower that, according to FCC records is within 200 meters of a number of broadcast facilities and applications:

Call	City	File Number	FIN	Licensee/Permittee
K33IG	BISMARCK, ND	BNPTTL-20000828BFQ	130279	INSPIRATION TELEVISION, INC.
NEW	BISMARCK, ND	BSFDTL-20060630BCK	167503	MINTZ, JULIE
K36HY	BISMARCK, ND	BNPTTL-20000828AXS	128100	CHARLES C. TOWNSEND, III
K39IF	BISMARCK, ND	BNPTTL-20000828AXU	128102	CHARLES C. TOWNSEND, III
K42HD	BISMARCK, ND	BNPTTL-20000828BGH	130380	INSPIRATION TELEVISION, INC.
K43JQ	BISMARCK, ND	BNPTTL-20000807AHO	131348	JULIE MINTZ
K46DY	BISMARCK, ND	BLTTL-19980925JA	3164	TRINITY BROADCASTING NETWORK
K46DY	BISMARCK, ND	BDFCDTT-20060331AIO	3164	TRINITY BROADCASTING NETWORK
NEW	BISMARCK, ND	BNPTTL-20000828AKX	126836	PRIME CITIES BROADCASTING, INC
KBMK	BISMARCK, ND	BLED-20060127ARK	93533	EDUCATIONAL MEDIA FOUNDATION
K203CK	BISMARCK, ND	BLFT-19980831TC	77228	BIBLE BROADCASTING NETWORK, INC.
KBFR	BISMARCK, ND	BLED-20031030AGD	90269	FAMILY STATIONS, INC.
KBEP-LP	BISMARCK, ND	BMPL-20060523AAW	133278	BISMARCK EDUCATIONAL PRAYER ASSOCIATION
K288FF	BISMARCK, ND	BMPFT-20060829BHU	150705	HORIZON CHRISTIAN FELLOWSHIP

Because of this large number of facilities and the complexities of calculations with multiple radiators on multiple towers, EMF believes that theoretical calculations would give inaccurate results at best.

Accordingly, EMF respectfully requests that the Commission grant the instant minor change of license with the condition that EMF make RF measurements before constructing the facility and submit the results of those measurements, along with the theoretical change caused by the addition of its antenna, prior to Commission grant of Program Test Authority.

If the results of the measurements and subsequent calculations reveal that there are areas that would exceed the requirements of OET 65 for controlled or uncontrolled access, EMF will work with the site owners and other broadcasters to erect fencing and/or signage to fully comply with OET 65.

After construction of the instant facility, EMF will continue to cooperate with other site users to reduce power or cease broadcasting as necessary to protect workers and others having access to the site from excessive levels of RF Radiation.