

Exhibit 36 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Capital of Texas Public Telecommunications Council
KLRU-DT Austin, Texas
Facility ID 8564
Ch. 22 700 kW 376 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Nature of The Proposal

Capital of Texas Public Telecommunications Council ("Capital") herein proposes minor amendment of the KLRU-DT pending Application, to specify changes in antenna location, antenna height above average terrain ("HAAT"), and antenna system. The proposed antenna will be mounted on an existing tower structure. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the Commission's Rules.

No change in the authorized overall structure height is proposed, thus no change in structure lighting or marking is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radio-frequency Radiation

The proposed operation was evaluated for human exposure to Radio-frequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the Radio-frequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

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The KLRU-DT antenna will be installed such that its center of radiation is 342.8 meters above ground level. An effective radiated power (“ERP”) of 700 kilowatts, horizontally polarized, will be employed. According to the elevation pattern data provided by the antenna manufacturer for the proposed antenna (Dielectric TFU-24GTH-RO4), the proposed KLRU-DT antenna will have a relative field of 8 percent or less from 15 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 8 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 22 (center frequency 521 MHz) is 347.3 $\mu\text{W}/\text{cm}^2$.

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 1.29 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 0.4 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any

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corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. *Capital* will coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

ENGINEERING EXHIBIT

Amendment to Application for Digital Television Station Construction Permit

prepared for

Capital of Texas Public Telecommunications Council
KLRU-DT Austin, Texas

Facility ID 8564
Ch. 22 700 kW 376 m

Table of Contents

FCC Form 340, Section VII-DTV

Exhibit 34

Statement A	Allocation Considerations - Interference Analysis
Table I	Interference Analysis Results Summary

Exhibit 36

Statement B	Environmental Considerations
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This material supplies a "hard copy" of the engineering portions of this application as entered October 4, 2002 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

Prepared by Mark Peabody, October, 2002

Cavell, Mertz & Davis, Inc.

Section VII Preparer's Certification

I certify that I have prepared Section VII (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MARK PEABODY		Relationship to Applicant (e.g., Consulting Engineer)	
Signature		Date 10/04/2002	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVENUE			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20109-
Telephone Number (include area code) 7033929090		E-Mail Address (if available) MPEABODY@CMDCONSULTING.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION VII - DTV Engineering	
Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.	
1.	The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects: (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. <input checked="" type="radio"/> Yes <input type="radio"/> No (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this location as established in 47 C.F.R. Section 73.622. <input checked="" type="radio"/> Yes <input type="radio"/> No (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. <input type="radio"/> Yes <input checked="" type="radio"/> No
2.	The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13. <input checked="" type="radio"/> Yes <input type="radio"/> No
3.	Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. <input checked="" type="radio"/> Yes <input type="radio"/> No
4.	The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. <input checked="" type="radio"/> Yes <input type="radio"/> No
5.	The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. <input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION VII - DTV Engineering
TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX	
1.	Channel Number: DTV 22 Analog TV, if any 18
2.	Zone: I <input type="radio"/> II <input type="radio"/> III <input checked="" type="radio"/>
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 30 Minutes 19 Seconds 19 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 97 Minutes 48 Seconds 12 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1234758 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 254.5 meters
6.	Overall Tower Height Above Ground Level: 369.1 meters
7.	Height of Radiation Center Above Ground Level: 342.8 meters
8.	Height of Radiation Center Above Average Terrain (HAAT): 357.5 meters
9.	Maximum Effective Radiated Power (average power): 700 kW
10.	Antenna Specifications: a. Manufacturer DIE Model TFU-24GTH-R O4 b. Electrical Beam Tilt: 0.75 degrees <input type="checkbox"/> Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685(c). [Exhibit 32] d. Polarization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]
10e. Directional Antenna Relative Field Values	

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees): No Rotation

Degrees	Value										
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	

Additional Azimuths

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 33]

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** items 1(a), (b), or (c) are answered "No".) Yes No [Exhibit 34]
 If "No", attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** item 3 is answered "No".) [Exhibit 35]

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 36]
 a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.
 By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.
 If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

PREPARERS CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

Exhibits

Exhibit 1

Description: APPLICATION AMENDMENT

APPLICANT IS CHANGING ITS TRANSMITTER LOCATION, ANTENNA HEIGHT, AND SPECIFIED ANTENNA MANUFACTURER AND IS AMENDING SECTION VII-TV (TECH BOX), FCC FORM 340. SPECIFICALLY, SECTION VII-DTV, ITEMS 3, 4, 5, 6, 7, 8, 10, 11 & 13. EXHIBITS 34 AND 36 FOR ITEMS 11 & 13 HAVE BEEN REPLACED.

Attachment 1

Attachment 32

Exhibit 34

Description: EXHIBIT 34 - ALLOCATIONS CONSIDERATIONS & INTERFERENCE ANALYSIS

ATTACHED AS EXHIBIT 34

Attachment 34

Description	Type	Conversion	
		Status	File
Exhibit 34 - Allocations Considerations & Interference Analysis	Adobe Acrobat File	not needed	PDF

Attachment 35

Exhibit 36

Description: EXHIBIT 36 - ENVIRONMENTAL CONSIDERATIONS

ATTACHED AS EXHIBIT 36

Attachment 36

Description	Type	Conversion	
		Status	File
Exhibit 36- Environmental Considerations	Adobe Acrobat File	not needed	PDF