

EXHIBIT 29

This application is categorically excluded from environmental processing by Section 1.1306 of the FCC Rules. It is excluded since the application does not involve a site location as described in Section 1.1307(a) and does not exceed the safety standards for human exposure to radio-frequency (RF) energy in Section 1.1307(b) as described below. Since the application is considered not to have a significant effect on the quality of the human environment under Section 1.1307(a) and (b), environmental processing is not required.

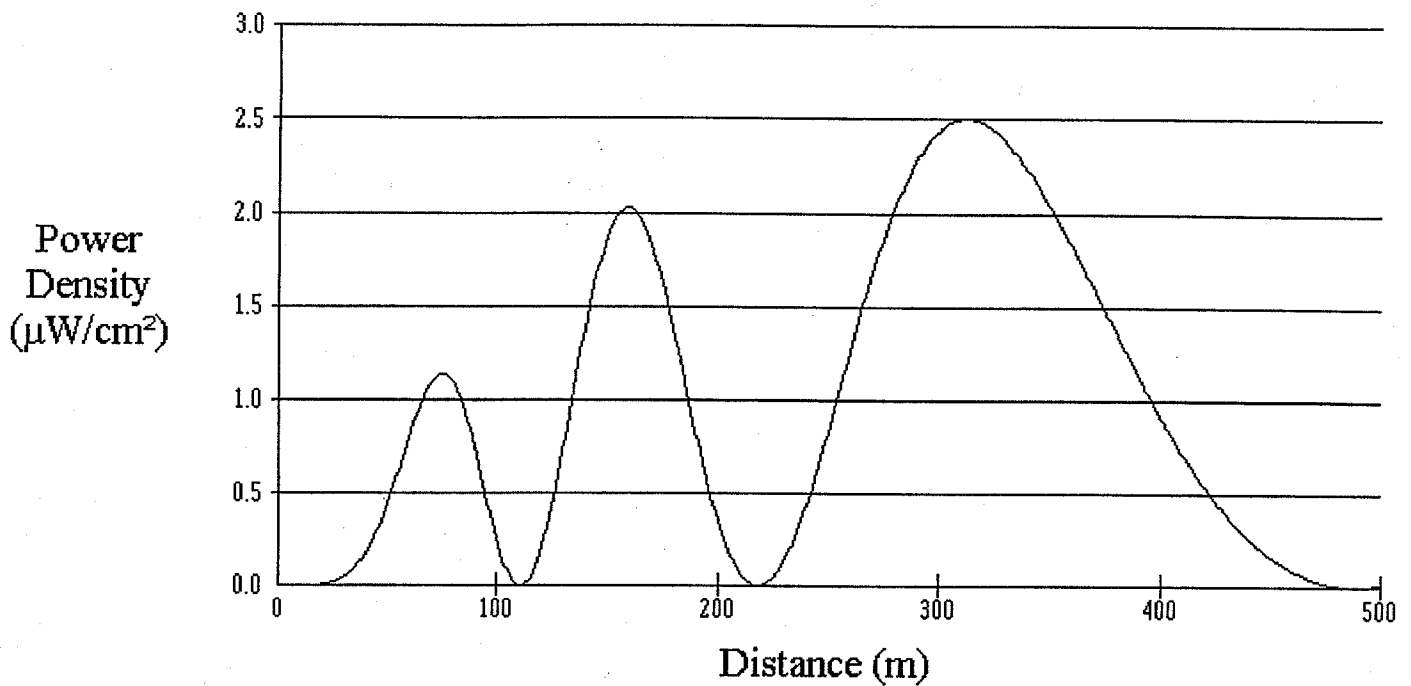
The proposed KCMT facility will not subject workers or the general population to levels of radiofrequency energy in excess of the *Radiofrequency Radiation Exposure Limits* contained in §1.1310 of the FCC Rules. An evaluation of the proposed transmitter was conducted in accordance with the methodology outlined in *OET Bulletin 65, Version 97-01* and the station was found to be in full compliance with the Maximum Permissible Exposure (MPE) limits for both uncontrolled and controlled exposure.

The worst case contribution from the transmitter of KCMT is estimated to be 2.5 $\mu\text{W}/\text{cm}^2$ at any location two meters above ground. This worst case level is demonstrated on the attached power density versus distance graph. The graph was developed using the Commission's *FM Model, Version 2.10*, which is designed to calculate power density levels accessible at locations two meters above ground for typical FM antenna designs.

The MPE guidelines for FM frequencies are 200 $\mu\text{W}/\text{cm}^2$ for uncontrolled exposure and 1,000 $\mu\text{W}/\text{cm}^2$ for controlled exposure. The estimated worst case contribution from the KCMT transmitter is less than 2% of the limit for uncontrolled exposure and less than 1.0% of the limit for controlled exposure. Since the predicted worst case power density level for the KCMT transmitter is below 5% of the uncontrolled and controlled exposure guidelines, the station is not required to share responsibility for compliance in any accessible area or areas where the appropriate limits may be exceeded as a result of radiofrequency contributions from other existing or future transmitters.

Arizona Lotus Corp. will adopt a work policy in connection with the KZPT transmitter that is designed to avoid occupational exposure in excess of the MPE controlled limit. Workers will be protected from excessive exposure to radiofrequency fields in areas of close proximity to the radiofrequency source in accordance with the methods recommended in *OET Bulletin No. 65, Version 97-01*. Preventive steps to avoid harmful exposure include the scheduling of work when the facility is shut down or operating at reduced power or by time averaging.

Power Density vs Distance



Office of Engineering and Technology

Distance (m):	500	Antenna Type:	ERI or JAMPRO JBCP "Rototiller" (EPA)
Horizontal ERP (W):	100000	Number of Elements:	8
Vertical ERP (W):	100000	Element Spacing:	5
Antenna Height (m):	136		

EXHIBIT 29
POWER DENSITY VS. DISTANCE GRAPH
KCMT 100 KW 20 METERS AAT CH. 271C1
ORO VALLEY, ARIZONA

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