

EXHIBIT 17-A

Human Exposure to Radiofrequency Electromagnetic Field & Section 106 Compliance (Environmental)

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. 1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997, regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. Frank G. McCoy, licensee of FM translator W223CG¹ seeks to modify the W223CG (Facility ID# 156555), licensed to Waukegan, Illinois, by relocating to an existing tower 152 meters (498.6 ft.) overall height with ASR Registration Number 1035102. W223CG would operate with an effective radiated power of 120 watts vertical polarization with a directional antenna at 135 meters HAAT with service to S. Milwaukee, WI. The tower is located at 42° 51' 20" N ~ 87° 50' 41" W (NAD 27). The proposed antenna is a side mounted Kathrein-Scala CA2-FM antenna with a center of radiation of 120 meters AGL and oriented at an azimuth of 198 degrees true. 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 FCC Rules. Because W223CG proposes to operate from an existing tower and no changes are being made to the tower, it is believed to be exempt from a Section 106 review by the SHPO/THPO.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. The proposed FM transmit antenna is a Kathrein-Scala CA2-FM. This antenna is not included in the Commission's FM Model for Windows program. Therefore the FCC FM Model Program shows a worst case scenario by using the Phelps-Dodge "Ring-Stub" or dipole (EPA) antenna. Using this antenna, the maximum calculated signal density near the tower at two meters above ground level attributable to the proposed facility is 0.274 $\mu\text{W}/\text{cm}$ at 27 meters, which is 0.137 percent of the general population/uncontrolled maximum permitted exposure limit. This is well below the five percent threshold limit described in 1.1307(b) regarding sites with multiple emitters, which excludes applicant from responsibility for taking any corrective action in areas where the proposal's contribution is less than five percent.

The applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

¹ W223CG has a pending Form 350 for W277CV, which specifies operation on Channel 277D.