

EXHIBIT 47
(Page 1 of 2)

NONIONIZING RADIATION COMPLIANCE
Journal Broadcast Corporation
Green Bay, WI

The proposed WGBA-TV facilities will fully comply with the FCC standard regarding human exposure to nonionizing radiation. Equation (2), found on Page 30 of Supplement A to OET Bulletin 65, details the calculation technique used to determine the power density at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (1000 kilowatts) for the expression $[0.4ERP_v + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Utilizing the vertical pattern data from Exhibit 44 in conjunction with this equation yields a predicted maximum power density at two meters above ground level of $1.42 \mu\text{W}/\text{cm}^2$ from these proposed facilities, which will occur at a depression angle of 66° . Since the maximum permitted power density for uncontrolled exposure on TV Channel 41 is $421.3 \mu\text{W}/\text{cm}^2$, this amounts to only 0.34% of the permitted level for uncontrolled exposure. Since this is less than 5% of the permitted level, the proposed facilities are excluded from environmental processing and need not be considered in conjunction with other co-located and nearby facilities to establish compliance with this standard for uncontrolled exposure.

WGBA-TV, in conjunction with other co-located and nearby facilities, will also take appropriate steps to insure that workers who must climb this tower will not be exposed to power densities exceeding the permitted level for controlled exposure. This will include a reduction in power or the cessation of operation, as appropriate, by WGBA-TV and/or other co-located or nearby facilities at any time that workers must be on this

EXHIBIT 47
(Page 2 of 2)

tower in any area where the total power density exceeds the permitted level for controlled exposure.