

CALL COMMUNICATIONS GROUP, INC.
Technical Exhibits in Support of **Minor Amendment** to
Application for NCE-FM Construction Permit (BNPED-20071019ADW)

NEW NCE-FM CH220A – 91.9MHz – 1.5 kW 100 M HAAT – FT. MYERS, FL

Environmental Protection Act / RF Radiation Compliance (Table 2)

The Rules require that an addition to any multiple use site must not contribute non-ionizing RF Radiation in excess of the total limits for each class of service in either of the two selected environments. In the case of FM, this limit is 1,000 microwatts for the controlled, or worker environment, or 200 microwatts for the uncontrolled, or public, environment per square centimeter at 2 meters above ground level.

NEW-FM proposes to use a SHIVELY 6810-2 antenna located at 99 meters AGL.

The contribution of radiation within 10 meters from the base of the tower (controlled environment) is 0.11 microwatts per square centimeter at 2 meters above ground level, which is 0.011% of the ANSI limit for the controlled environment.

For the uncontrolled environment, the maximum power density contribution is predicted to be 1.4 microwatts per square centimeter at 2 meters above ground level. The maximum power density contributed by NEW-FM is predicted to extend no farther than 64.4 meters from the base of the tower. This represents a “worst case” power density level contribution which is only 0.7% of the ANSI limit for the uncontrolled environment.

Given that access within 10 meters to the site will be restricted by a locked fence, and given that no more than 1.4 microwatts per square centimeter at 2 meters above ground level (0.7% of the ANSI limit) is expected to be contributed by NEW-FM at any point beyond 64.4 meters from the base of the tower, the total radiation contributed by NEW-FM would be less than the ANSI limit for all points in both the controlled and the uncontrolled environments. Since this is less than the 5% threshold described in OET Bulletin #65, the contribution of the proposed facility should be categorically excluded from environmental processing with respect to 47 CFR Section 1.1306.

Therefore, this proposal is fully compliant with the provisions of OET Bulletin #65 as recently amended.

The contribution of NEW-FM was calculated using FCC FM Model v2.10 Beta. Further to the requirements and intentions of the FCC, Applicant will post appropriate signs at entrances to the property, on the walls and doors of buildings containing transmitters, and on fences warning the public and workers of the potential hazard.

Applicant will require that the power to the antenna be reduced as necessary to accommodate workers or will discontinue operation, if necessary, for this purpose.

Table 2.

Radiofrequency Electromagnetic Exposure Analysis for NEW-FM

Source	Height AGL(m)	Antenna type	Bays	Horizontal ERP (kw)	Vertical ERP (kw)	Power Density $\mu\text{W}/\text{cm}^2$ at 2 meters AGL				
						Max. PD within 10 m distance	% controlled environment limit (1000 $\mu\text{W}/\text{cm}^2$)	Max. PD beyond 10 m	% uncontrolled environment limit (200 $\mu\text{W}/\text{cm}^2$)	Distance to max PD past 10 m (m)
NEW-FM	99	SHI-6810-2	2	1.500	1.500	0.1100	0.0110%	1.400	0.700%	64.4
TOTAL						0.1100	0.0110%	1.400	0.700%	64.4

(proposed)

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments).

Calculations made using FCC FM Model v2.10 Beta