

## **Exhibit #22**

### **ENVIRONMENTAL PROTECTION ACT**

#### **VERMONT PUBLIC RADIO**

Minor Modification of Construction Permit

BNPED-20071018BCF

Brattleboro, VT

March 2011

CH 205B1

7.2 kW H & V Omni

Vermont Public Radio ("the applicant") proposes the use of an existing unregistered tower, constructed prior to March 2001. No further environmental processing was deemed necessary. The site is on private property, and access is protected by an electronic gate which needs to be opened for access to the site. This is a controlled area.

The proposed antenna will be energized so that it radiates 7.2 kW in the horizontal and vertical planes, from a height above ground of 35 meters. Based on the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, the existing facility produces a worst-case maximum R.F. non-ionization radiation level at a position six feet above the tower base (head level - based on the C.O.R. of 35.1 meters above ground minus 2 meters) of 441.78 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ). This figure is without regard for the antenna's vertical elevation field value toward the nadir, which will cause a reduction in the predicted "worst case" calculations. 441.78  $\mu\text{W}/\text{cm}^2$  is 44.18 percent of the maximum for this controlled area.

Since "worst case" calculations were used, and since it is well known that the actual RF power density level is considerably reduced at vertical angles toward the nadir the applicant is confident that actual RF contribution of this antenna will be less than is predicted here.

After researching the Mass Media and ULS databases, it was determined that there is one other source of RF emissions on the tower. FM translator W233AR, with 0.01 kW ERP at an antenna height of 37 meters above ground, is categorically excluded from evaluation.

The proposed FM station will not contribute RF emissions over that which is permissible by Section 1.1307 of the FCC's Rules.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.