

**ONE-STEP UPGRADE/
MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
KACL RADIO STATION
CH 254C0 - 98.7 MHZ - 100.0 KW
BISMARCK, NORTH DAKOTA
March 2006**

EXHIBIT A

Radio Frequency Assessment

Since the proposed KACL will be co-located with FM stations KKCT and KBYZ, and is located within 315 meters of several TV stations, the use of the worksheets to demonstrate compliance with the radio frequency radiation rules is not possible. Therefore, this 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 ("Bulletin"), regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. This study considers all nearby stations, specifically KKCT (proposed), KBYZ (proposed), the New FM at Hazelton, North Dakota ("New FM"), KVLQ, a pending application for Cannon Ball, North Dakota ("Cannon Ball") and TV stations KNDX, K64GN and K44HU, and utilizes the appropriate formulas contained in the Bulletin.³

The proposed KACL antenna system will be mounted with its center of radiation 210.3 meters (690.0 feet) above the ground at the existing tower location and will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). The proposed KACL antenna is a Dielectric DCRM twelve bay, 0.75 wavelength spaced system (FCC/EPA Type #7). At 2.0 meters, the height of an average person above the

3) The FM Model program was used to calculate the FM stations' contributions. The EPA single bay dipole was used unless otherwise noted. Any broadcast facilities within 315 meters of the proposed site is considered a contributor, and further, will be considered co-located for the purposes of this instant review.

ground at the base of the tower, the KACL antenna system will contribute 0.0003 mw/cm^2 .⁴ Based on exposure limitations for a controlled environment, <0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.2% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The proposed KKCT antenna system will be mounted with its center of radiation 210.3 meters (690.0 feet) above the ground at the existing tower location and will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). The proposed KKCT antenna is a Dielectric DCRM twelve bay, 0.75 wavelength spaced system (FCC/EPA Type #7). At 2.0 meters, the height of an average person above the ground at the base of the tower, the KKCT antenna system will contribute 0.0003 mw/cm^2 .⁵ Based on exposure limitations for a controlled environment, <0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.2% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The proposed KBYZ antenna system will be mounted with its center of radiation 210.3 meters (690.0 feet) above the ground at the existing tower location and will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). The proposed KBYZ antenna is a Dielectric DCRM twelve bay, 0.75 wavelength spaced system (FCC/EPA Type #7). At 2.0 meters, the height of an average person above the

4) This level of field occurs at 138.0 meters out from the base of the tower and is considered worst case.

5) This level of field occurs at 138.0 meters out from the base of the tower and is considered worst case.

ground at the base of the tower, the KBYZ antenna system will contribute 0.0003 mw/cm^2 .⁶ Based on exposure limitations for a controlled environment, <0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.2% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The proposed New FM antenna system will be mounted with its center of radiation 198.7 meters (651.8 feet) above the ground at the existing tower location and will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). The proposed New FM antenna is a Dielectric DCRM twelve bay, 0.75 wavelength spaced system (FCC/EPA Type #7). At 2.0 meters, the height of an average person above the ground at the base of the tower, the New FM antenna system will contribute 0.0003 mw/cm^2 .⁷ Based on exposure limitations for a controlled environment, <0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.2% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The authorized KVLQ antenna system is mounted with its center of radiation 118.0 meters (387.2 feet) above the ground at the existing tower location and operates with an effective radiated power of 0.95 kilowatt in the horizontal and vertical planes (circularly polarized). The KVLQ antenna is an Electronics Research, Inc., rototiller type system (FCC/EPA Type #3). At 2.0 meters, the height of an average person above the ground at the base of the tower, the KVLQ

6) This level of field occurs at 138.0 meters out from the base of the tower and is considered worst case.

7) This level of field occurs at 131.0 meters out from the base of the tower and is considered worst case.

antenna system contributes 0.0010 mw/cm^2 .⁸ Based on exposure limitations for a controlled environment, 0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.5% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The proposed Cannon Ball antenna system will be mounted with its center of radiation 175.0 meters (574.1 feet) above the ground at the existing tower location and will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). The proposed Cannon Ball antenna is a twelve bay, 0.9 wavelength spaced, Jampro Double V style (FCC/EPA Type #2).⁹ At 2.0 meters, the height of an average person above the ground at the base of the tower, the Cannon Ball antenna system will contribute 0.0012 mw/cm^2 .¹⁰ Based on exposure limitations for a controlled environment, 0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 0.6% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The authorized KNDX Channel 26+ antenna system is mounted with its center of radiation 202.0 meters (662.7 feet) above the ground at the existing tower location and operates with an effective radiated power of 741 kilowatts in the horizontal plane. As denoted in OET Bulletin #65, Supplement A, Page 31, the typical UHF antenna system has a downward radiation field of 0.1. As such, the KNDX antenna system radio frequency radiation calculations were made based on an effective radiated power of 7.41 kilowatts. At 2.0 meters, the height of an

8) This level of field occurs at 116.0 meters out from the base of the tower and is considered worst case.

9) Based on the information contained in the Cannon Ball application for permit, BNPH-20060309ABC.

10) This level of field occurs at 41.0 meters out from the base of the tower and is considered worst case.

average person above the ground at the base of the tower, the KNDX antenna system contributes 0.0012 mw/cm^2 . Based on exposure limitations for a controlled environment, 0.2% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 1.1% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The authorized K64GN Channel 64Z antenna system is mounted with its center of radiation 180.0 meters (590.6 feet) above the ground at the existing tower location and operates with an effective radiated power of 100 kilowatts in the horizontal plane. As denoted in OET Bulletin #65, Supplement A, Page 31, the typical UHF antenna system has a downward radiation field of 0.1. As such, the K64GN antenna system radio frequency radiation calculations were made based on an effective radiated power of 1.0 kilowatt. At 2.0 meters, the height of an average person, above the ground at the base of the tower, the K64GN antenna system contributes 0.0007 mw/cm^2 . Based on exposure limitations for a controlled environment, $<0.1\%$ of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, $<0.1\%$ of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

The authorized K44HU Channel 44+ antenna system is mounted with its center of radiation 177.0 meters (580.7 feet) above the ground at the existing tower location and operates with an effective radiated power of 20 kilowatts in the horizontal plane. As denoted in OET Bulletin #65, Supplement A, Page 31, the typical UHF antenna system has a downward radiation field of 0.1. As such, the K44HU antenna system radio frequency radiation calculations were made based on an effective radiated power of 0.2 kilowatt. At 2.0 meters, the height of an average person above the ground at the base of the tower, the K44HU antenna system contributes

0.0001 mw/cm². Based on exposure limitations for a controlled environment, <0.1% of the allowable ANSI limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, <0.1% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

Combining the contributions of KACL, KKCT (proposed), KBYZ (proposed), New FM, KVLQ, Cannon Ball, KNDX, K64GN and K44HU, a total of 3.2% of the uncontrolled environment limit is reached at 2.0 meters above ground at the base of the tower. Since this level for uncontrolled environments is well below the 100% limit defined by the Commission, the proposed KACL facility is believed to be in compliance with the radio frequency radiation exposure limits as is required by the Federal Communications Commission. Further, Cumulus will posted warning signs in the vicinity of the tower warning of potential radio frequency radiation hazards at the site. In addition, Cumulus will reduce the power of the facility or cease operation, in cooperation and coordination with other tower users, as necessary, to protect persons having access to the site, tower or antenna from radio frequency radiation in excess of FCC guidelines.