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**CONSULTING ENGINEERS**  
**OXON HILL, MARYLAND**

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**FCC FORM 301, EXHIBIT 17**  
**ENVIRONMENTAL ASSESSMENT**  
**APPLICATION FOR**  
**CONSTRUCTION PERMIT**  
**PREPARED FOR**  
**KXEL BROADCASTING COMPANY, INC.**  
**STATION KXEL**  
**WATERLOO, IOWA**  
**1540 KHZ    50 KW-U    DA-N**

This engineering exhibit was prepared on behalf of KXEL Broadcasting Company, Inc. (hereinafter KBC), licensee of standard broadcast station KXEL, Waterloo, Iowa, in support of an application for construction permit. The instant application requests correction of the KXEL daytime site geographic coordinates by one second of latitude and 23 seconds of longitude and correction of the KXEL nighttime site geographic coordinates by two seconds of latitude and 23 seconds of longitude. The licensed (FCC File Number BZ-19840202AF) geographic coordinates of the KXEL site are 42° 10' 46" North Latitude, 92° 18' 15" West Longitude, referenced to the 1927 North American Datum (NAD 27). The corrected geographic coordinates of the KXEL daytime nondirectional antenna (FCC Antenna Structure Registration (ASR) number 1045075) are 42° 10' 47" North Latitude, 92° 18' 38" West Longitude (NAD 27). The corrected geographic

coordinates of the center of the KXEL nighttime directional antenna system are 42° 10' 48" North Latitude, 92° 18' 38" West Longitude (NAD 27). No other changes to the KXEL authorized parameters are requested. Because there is no actual construction and no changes to the KXEL facility proposed, site plats, photographs, and allocation studies (both daytime and nighttime) are not included with this application.

The KXEL antenna system is located in an isolated, rural area. Public access to the bases of the two KXEL antenna system supporting structures is restricted by 1.8-meter high chain link fences topped with barbed wire, which enclose each of the KXEL antenna system supporting structures. The FCC ASR numbers of the two KXEL antenna supporting structures are 1045074 and 1045075.

#### ENVIRONMENTAL CONSIDERATIONS

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) would be involved for the following reasons:

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1. The proposed site is not in or near any location referenced in Section 73.1306(b)(1) of the FCC Rules as being of environmental interest.
2. The provision of Section 1.1306(b)(2) does not apply since high intensity lighting is not used.
3. A worst-case analysis of this proposal relative to radio-frequency radiation (RFR) exposure has been made using Tables 1 and 2 of FCC Office of Engineering and Technology (OET) *Supplement A, Edition 97-01, to, OET Bulletin 65, Edition 97-01*, August 1997. The proposed facility will not result in human exposure to radiation in excess of adopted exposure standards in any area outside the protective fences at the existing KXEL transmitter site.

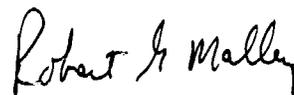
The minimum distance measured between a KXEL antenna system supporting structure and its protective fence is 9.1 meters. The KXEL radiator height is 190 degrees of electrical height (155 degrees plus 35 degrees of toploading) or  $0.53\lambda$  wavelength at 1540 kilohertz (kHz), the KXEL operating frequency. Tables 2 through 4, *Supplement A, Edition 97-01, to OET Bulletin 65, Edition 97-01*, indicate that a fence, erected at or beyond four meters in all directions from the tower base of an AM station employing 50 kilowatts nominal

power at 1540 kHz with radiator heights of  $0.25\lambda$  to  $0.625\lambda$ , prevents exposure to excessive RFR levels and indicates station compliance with FCC limits.

With regard to worker concerns, access to the KXEL directional antenna system supporting structures is restricted to authorized personnel only by means of the locked fence gates. Warning signs are posted at the base of each supporting structure alerting workers of the potential for overexposure if work is to be done on or in the vicinity of the supporting structure. KBC either reduces power or ceases operation completely at this site when workers must remain in the vicinity of a tower for an extended period.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on July 11, 2003.



Robert G. Mallery