

**Environmental Protection**

There are two main factors that need to be addressed in order to make sure that the environment around a proposed facility is protected.

**1) Significant affects to the environment.**

EMF's proposed facility will be constructed on an existing tower (tower ID 1014827) in an established "antenna farm". The site proposed herein has both registered and unregistered towers on the site. According to 47 C.F.R. Section 1.1306 Note 3, such facilities "will be categorically excluded" from environmental processing except for the RF requirements of Section 1.1307(b).

**2) Human exposure to excess levels of radiofrequency radiation.**

The proposed facility is to be built using a 3-bay circularly polarized full-wave spaced antenna.

According to OET 65, "Applicants and licensees should be able to calculate, based on considerations of frequency, power and antenna characteristics the distance from their transmitter where their signal produces an RF field equal to, or greater than, the 5% threshold limit. The applicant or licensee then shares responsibility for compliance in any accessible area or areas within this 5% "contour" where the appropriate limits are found to be exceeded."

As can be seen in Exhibit 31-A, the proposed facility's maximum contribution to RF on the site is  $3.7057\mu\text{W}/\text{cm}^2$  at a distance of 32 meters from the tower, which is 1.85% of the uncontrolled (public) exposure limit.

Therefore, because the proposed facility will not cause an RF field that is equal to or greater than 5% of the  $200\mu\text{W}/\text{cm}^2$  limit for uncontrolled exposure at any point, the proposed facility complies with the requirements of OET 65.

EMF will fully cooperate with other site users to temporarily reduce power or cease broadcasting, as necessary, to protect workers and others having access to the site from excessive levels of RF Radiation.

**Exhibit 31-A**  
**RF Analysis: WEKV South Webster, OH**

**WEKV**  
**Site type:** Proposed  
**Channel:** 235  
**Class:** A  
**ERP:** 2.1kw  
**Antenna:** ERI  
 Rototiller  
 3 bay  
 full wave  
**COR AGL:** 63m  
**Polarization:** circular

<b>Distance From Tower (m)</b>	<b>WEKV Facility</b>	<b>Total RF (uW/cm2)</b>	<b>Percent of 200uW/cm2</b>
0	1.0606	1.06	0.53
1	1.0603	1.06	0.53
2	1.0595	1.06	0.53
3	1.0581	1.06	0.53
4	1.0562	1.06	0.53
5	1.0537	1.05	0.53
6	1.1050	1.11	0.55
7	1.2162	1.22	0.61
8	1.3310	1.33	0.67
9	1.4487	1.45	0.72
10	1.5688	1.57	0.78
11	1.6906	1.69	0.85
12	1.8342	1.83	0.92
13	1.9825	1.98	0.99
14	2.1320	2.13	1.07
15	2.2816	2.28	1.14
16	2.4303	2.43	1.22
17	2.5753	2.58	1.29
18	2.7067	2.71	1.35
19	2.8330	2.83	1.42
20	2.9532	2.95	1.48
21	3.0660	3.07	1.53
22	3.1704	3.17	1.59
23	3.2661	3.27	1.63
24	3.3633	3.36	1.68
25	3.4487	3.45	1.72
26	3.5213	3.52	1.76
27	3.5803	3.58	1.79
28	3.6249	3.62	1.81
29	3.6548	3.65	1.83
30	3.6828	3.68	1.84
31	3.7026	3.70	1.85
<b>32</b>	<b>3.7057</b>	<b>3.71</b>	<b>1.85</b>
33	3.6920	3.69	1.85
34	3.6618	3.66	1.83
35	3.6153	3.62	1.81
36	3.5531	3.55	1.78
37	3.4879	3.49	1.74
38	3.4140	3.41	1.71
39	3.3251	3.33	1.66
40	3.2224	3.22	1.61
41	3.1071	3.11	1.55
42	2.9806	2.98	1.49
43	2.8443	2.84	1.42
44	2.6999	2.70	1.35
45	2.5309	2.53	1.27

Distance From Tower (m)	WEKV Facility	Total RF (uW/cm2)	Percent of 200uW/cm2
46	2.3578	2.36	1.18
47	2.1846	2.18	1.09
48	2.0126	2.01	1.01
49	1.8429	1.84	0.92
50	1.6769	1.68	0.84
51	1.5156	1.52	0.76
52	1.3600	1.36	0.68
53	1.2109	1.21	0.61
54	1.0685	1.07	0.53
55	0.9342	0.93	0.47
56	0.8087	0.81	0.40
57	0.6921	0.69	0.35
58	0.5849	0.58	0.29
59	0.4872	0.49	0.24
60	0.3990	0.40	0.20
61	0.3203	0.32	0.16
62	0.2511	0.25	0.13
63	0.1910	0.19	0.10
64	0.1397	0.14	0.07
65	0.0972	0.10	0.05
66	0.0631	0.06	0.03
67	0.0368	0.04	0.02
68	0.0180	0.02	0.01
69	0.0061	0.01	0.00
70	0.0005	0.00	0.00
71	0.0009	0.00	0.00
72	0.0065	0.01	0.00
73	0.0170	0.02	0.01
74	0.0317	0.03	0.02
75	0.0501	0.05	0.03
76	0.0719	0.07	0.04
77	0.0966	0.10	0.05
78	0.1236	0.12	0.06
79	0.1525	0.15	0.08
80	0.1830	0.18	0.09
81	0.2145	0.21	0.11
82	0.2469	0.25	0.12
83	0.2796	0.28	0.14
84	0.3124	0.31	0.16
85	0.3451	0.35	0.17
86	0.3772	0.38	0.19
87	0.4087	0.41	0.20
88	0.4392	0.44	0.22
89	0.4687	0.47	0.23
90	0.4968	0.50	0.25
91	0.5219	0.52	0.26
92	0.5454	0.55	0.27
93	0.5671	0.57	0.28
94	0.5871	0.59	0.29
95	0.6052	0.61	0.30
96	0.6215	0.62	0.31
97	0.6359	0.64	0.32
98	0.6484	0.65	0.32
99	0.6591	0.66	0.33
100	0.6679	0.67	0.33