

Human exposure to excess levels of radiofrequency radiation

In order to comply with OET 65, EMF carefully investigated RF sources on the site, and learned that the site is not straightforward. There are multiple towers and multiple radiators on each tower. The proposed modification to K220ET is to be built on a tower that, according to FCC records is within 200 meters of a number of broadcast facilities:

Status	Call	Licensee/Permittee	Channel	City	FIN
LIC	K215BY	Utah State University of Agriculture	215	Emery County, UT	81414
LIC	K292AI	Green River City TV	292	Green River, UT	25169
LIC	K07OV	Green River City TV	07	Green River, UT	25178
LIC	K09CX	Green River City TV	09	Green River, UT	25177
LIC	K11DD	Green River City TV	11	Green River, UT	25172
LIC	K13DB	Green River City TV	13	Green River, UT	25179
LIC	K36FX	Green River City TV	36	Green River, UT	25175
LIC	K38GP	Green River City TV	38	Green River, UT	25167
LIC	K41JS-D	Green River City TV	41	Green River, UT	167576
LIC	K42HP-D	Green River City TV	42	Green River, UT	167577
LIC	K43KG-D	Green River City TV	43	Green River, UT	167578
LIC	K44IK-D	Green River City TV	44	Green River, UT	167579
LIC	K45JV-D	Green River City TV	45	Green River, UT	167580
LIC	K47KX-D	Green River City TV	47	Green River, UT	167581

Because of this large number of facilities and the complexities of calculations with multiple radiators on multiple towers, EMF believes that theoretical calculations would give inaccurate results at best.

Accordingly, EMF respectfully requests that the Commission grant the instant Construction Permit with the condition that EMF make RF measurements before constructing the facility and submit the results of those measurements, along with the theoretical change caused by the addition of its antenna, prior to Commission grant of Program Test Authority.

If the results of the measurements and subsequent calculations reveal that there are areas that would exceed the requirements of OET 65 for controlled or uncontrolled access, EMF will work with the site owners and other broadcasters to erect fencing and/or signage to fully comply with OET 65.

Further, after construction of the instant facility, EMF will continue to cooperate with other site users to reduce power or cease broadcasting as necessary to protect workers and others having access to the site from excessive levels of RF Radiation.