

**RFR STATEMENT
CONCERNING THE APPLICATION OF
NM LICENSING, LLC.
FOR AUTHORITY TO MODIFY
KURK (FM)
RENO, NV**

Ch. 225C2 (92.9 MHz) 48 KW (H&V) 153 M

The proposed FM facility was evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OET Bulletin No. 69, Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation. The calculated power density at ground level was calculated using data supplied by ERI, the proposed antenna manufacturer, using the modified OST formula, which takes into account ERP, number of bays and their spacing, distance from the center of radiation to ground level, and vertical angle.

The proposed operation, assuming an ERP of 48 KW (H & V) 8-bay, half-wave spacing, 51.8 meters distance and location near the tower base, and location near the tower base, the calculated RFR density is negligible, as compared to the recommended limit of 1000 microwatts/cm-squared for FM frequencies in the controlled environment, and the Commission's limit of 200 microwatts in the non-controlled environment. Peak ground level power density occurs at a point approximately 65 meters from the tower base, with a calculated power density of 5.75 microwatts/cm-squared, which is 0.58% of the limit in controlled and 2.88% in the uncontrolled environment.

Since this is a proposed duplex operation with co-owned KJZS, Sparks, NV, (FM Channel 221) the individual and combined RFR density is calculated. The KJZS proposed operation, assuming an ERP of 8.9 KW (H & V) 8-bay, half-wave spacing, 51.8 meters distance and location near the tower base, the calculated RFR density is negligible, as compared to the recommended limit of 1000 microwatts/cm-squared for FM frequencies in the controlled environment, and the Commission's limit of 200 microwatts in the non-controlled environment. Peak ground level power density occurs at a point approximately 65 meters from the tower base, with a calculated power density of 1.067 microwatts/cm-squared, which is 0.11% of the limit in controlled and 0.53% in the uncontrolled environment.

As shown, the individual and combined operation of KURK and KJZS is well within FCC guidelines.

The 115 dBu blanketing contour for the proposed E.R.P. of 48 KW (H&V) extends 2.73 KM from the site. The applicant recognizes its responsibility to remedy complaints of blanketing interference as required by Section 73.318 of the FCC Rules. Although no adverse electromagnetic interference is expected, the applicant recognizes its responsibility to correct problems that result from the proposed operation.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, a policy will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.



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