

Exhibit 18 - Statement D  
**ENVIRONMENTAL CONSIDERATIONS**

prepared for  
KXO El Centro, California  
Facility Id 35969  
1230 kHz 1 kW ND-1 U

*KXO, Inc. ("KXO")* proposes relocate the transmitting facilities of KXO(AM), El Centro, California to a new tower. This application proposes the use of a new tower site for KXO(AM) and its co-owned FM station, KXO-FM (Ch 298B, El Centro, California, Facility Id 35970). An environmental study in accordance with Section 1.1306 of the Commission's Rules has been commissioned by others. The applicant believes there to be no issues related to NEPA Section 106. It is believed that preparation of an Environmental Assessment is not required. Only the impact of human exposure to radiofrequency energy is evaluated herein.

The proposed operation at this site was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET-65"). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in Section 1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in Section 1.1310 if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with those guidelines.

**KXO(AM) 1230 kHz - Contribution to points 2 meters from the tower**

The general population/uncontrolled maximum permitted exposure ("MPE") limit specified in §1.1310 for 1230 kHz is 614 mV/m electric field strength and 1.63 A/m magnetic field strength. At KXO(AM)'s frequency, the electrical height of the tower is 0.369 wavelengths (132.8 degrees). KXO(AM) is proposing to operate with 1 kW non-directionally both day and night.

Interpolated results from Figures 3 and 4 of OET-65, Supplement A, are used for the analysis herein. As stated above, the closest "publicly accessible" point to the tower base will be at least 2 meters from the tower base. The calculated electric ("E") field and

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magnetic (“H”) field along with the percentage of the general population / uncontrolled MPE limit (when squared per the technique described in OET-65) is shown in the table below.

<u>Power</u> (kW)	<u>Height</u> (deg)	<u>Distance</u> (m)	<u>E Field</u> (V/m)	<u>E Field</u> <u>Percent of</u> <u>MPE</u> (%)	<u>H Field</u> (A/m)	<u>H Field</u> <u>Percent of</u> <u>MPE</u> (%)
1.0	132.8	2.0	102.1	2.8	0.25	2.4

**KXO-FM 107.1 MHz - Maximum Contribution at 2 meters Above Ground Level**

The new KXO-FM facility will operate with an effective radiated power (“ERP”) of 50 kW with the antenna center of radiation 74 meters above ground level. KXO-FM will utilize an ERI 8-bay, half wave spaced directional antenna (model number SHPX-8AC-DA-HW). According to data provided by the antenna manufacturer, the maximum relative field value in nearby downward directions (between 13 and 90 degrees below the horizon) does not exceed 0.23. Thus, a relative field value of 0.23 relative field was used for this calculation. The general population / uncontrolled maximum permitted exposure (“MPE”) limit specified in §1.1310 for 107.5 MHz is 200  $\mu\text{W}/\text{cm}^2$ .

The formula used for calculating FM signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

S	=	power density in microwatts/cm <sup>2</sup>
F	=	relative field factor
ERP	=	total (average) ERP in Watts
D	=	distance in meters

Using this formula and the assumptions above, the proposed KXO-FM facility is predicted to contribute a power density of 34.1  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure (such as a point two meters from the base of the tower). This is 17.0 percent of the general population/uncontrolled MPE limit. At ground level

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locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

**Consideration of All Facilities**

A summary of total calculated RF electromagnetic field from all non-excluded transmitting facilities is provided herein for locations at ground level outside at a distance greater than two meters from the tower base. Given the assumptions above, the calculated percentage of the RF electromagnetic field MPE at the closest publicly accessible point near the tower base is summarized in the table below. As shown, considering all broadcast facilities, in no case will the human exposure to RF electromagnetic fields exceed the uncontrolled / general population MPE limit specified in §1.1310.

<u>Facility</u>	<u>Maximum MPE</u>
KXO(AM)	2.8 %
<u>KXO-FM</u>	<u>17.0 %</u>
<b>Total</b>	<b>19.8%</b>

**Safety of Tower Workers and the General Public**

As demonstrated herein, excessive levels of RF energy will not be caused at accessible areas near the tower. With respect to worker safety, a site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed in the vicinity of or on the tower. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. Further, no worker will be permitted to climb an energized tower. On-site RF exposure measurements may also be undertaken to more specifically establish the bounds of safe working areas.

**Conclusion**

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules.