

**Compliance with Special Operating Conditions**

The KSLY Construction Permit (File Number BPED-20180628AAC) contains Special Operating Conditions summarized as follows:

1. THE AUTOMATIC PROGRAM TEST PROVISIONS OF 47 C.F.R. SECTION 73.1620 DO NOT APPLY IN THIS CASE. A FORMAL REQUEST FOR PROGRAM TEST AUTHORITY MUST BE FILED IN CONJUNCTION WITH FCC FORM 302-FM, APPLICATION FOR LICENSE, BEFORE PROGRAM TESTS WILL BE AUTHORIZED. This request must contain documentation which demonstrates compliance with the following special operating condition(s):
2. The permittee shall, upon completion of construction and during the equipment test period, make proper radiofrequency electromagnetic (RF) field strength measurements throughout the transmitter site area to determine if there are any areas that exceed the FCC guidelines for human exposure to RF fields. If necessary, a fence must be erected at such distances and in such a manner as to prevent the exposure of humans to RF fields in excess of the FCC Guidelines (OET Bulletin No. 65, Edition 97-01, August 1997). The fence must be a type which will preclude casual or inadvertent access and must include warning signs at appropriate intervals which describe the nature of the hazard. Any areas within the fence found to exceed the recommended guidelines must be clearly marked with appropriate visual warning signs.
3. Documentation demonstrating compliance with the special operating condition(s) shall be submitted at the time of the filing of FCC 302-FM .
4. The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines .

Educational Media Foundation ("EMF"), complies with or agrees to, these conditions as follows:

1. EMF is requesting formal program test authority along with this 302-FM license application.
2. RF Field Strength measurements have been done and no areas have been found to be in excess of the general public exposure limits.
3. The RF Field Strength measurements are seen in Exhibit 9-A
4. Educational Media Foundation, in coordination with other users of the site, agrees to reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

### **Environmental Effects**

Educational Media Foundation (“EMF”) certifies that KSLY complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments.

The RF worksheet in the Instructions to form 303-S was unusable to determine compliance for this facility because of the worst-case nature of the worksheet. Therefore, on December 21, 2018, Alan Camacho, Engineer for Educational Media Foundation, used EMF’s “shaped probe” Narda RFR measurement equipment<sup>1</sup> to evaluate radiofrequency exposure compliance at the KSLY transmitter site. The KSLY transmitter was operating at its fully permitted effective radiated power of 4.5kw while these tests were made.

Measurements were taken at the base of the tower and at various points around the tower compound, obstacles permitting. The probes were slowly swept between 1-2 meters above the ground, as well as approximately 1 meter side-to-side, seeking, and noting, the highest overall readings. The highest overall peak reading found during these measurements was 70.60% of the uncontrolled/public exposure limits of OET-65. This peak reading is seen on line #51 on the data readings and is a distance of 77 meters from the base of the KSLY tower.

A full showing of the RF Readings is seen in the attached tables. The peak readings are pin pointed on the attached Google Earth Map.

These values are below the FCC limits for human exposure to RF fields. Therefore, no fencing or warning signs are required.

Based on this evaluation, KSLY fully complies with the FCC’s maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments.

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<sup>1</sup> Instrument: Narda NBM-550, Serial Number B-0755, Calibration date 02/07/2017  
Probe: Narda 2402/07, Serial Number 01057 Calibration date 02/07/2017

	A	B	C	D	E	F
1	Date/Time	Max (E-Field) [% STD]	Avg (E-Field) [% STD]	Max %GP	Latitude	Longitude
2	12/21/2018 11:15:28	5.74	4.09	28.72	35.36035	-120.6567
3	12/21/2018 11:15:33	4.54	3.05	22.71	35.36036	-120.6567
4	12/21/2018 11:15:38	4.86	3.53	24.29	35.36037	-120.65675
5	12/21/2018 11:15:43	4.84	3.82	24.18	35.36038	-120.65677
6	12/21/2018 11:15:48	4.34	3.61	21.68	35.36039	-120.65679
7	12/21/2018 11:15:53	4.26	3.24	21.31	35.36041	-120.65679
8	12/21/2018 11:15:58	3.03	2.50	15.13	35.36042	-120.65681
9	12/21/2018 11:16:03	3.13	2.48	15.65	35.36043	-120.65684
10	12/21/2018 11:16:08	3.33	2.58	16.65	35.36042	-120.65686
11	12/21/2018 11:16:13	2.82	2.29	14.09	35.36044	-120.65688
12	12/21/2018 11:16:18	2.90	2.23	14.49	35.36046	-120.65689
13	12/21/2018 11:16:23	3.57	3.10	17.85	35.36047	-120.65691
14	12/21/2018 11:16:28	3.85	3.35	19.24	35.3605	-120.65693
15	12/21/2018 11:16:33	3.52	3.15	17.62	35.3605	-120.65696
16	12/21/2018 11:16:38	4.17	3.63	20.83	35.36052	-120.65698
17	12/21/2018 11:16:43	5.31	4.59	26.54	35.36055	-120.65699
18	12/21/2018 11:16:48	4.68	3.70	23.41	35.36057	-120.65702
19	12/21/2018 11:16:53	4.48	3.96	22.39	35.36057	-120.65701
20	12/21/2018 11:16:58	5.29	4.82	26.47	35.36058	-120.65699
21	12/21/2018 11:17:03	6.60	5.65	33.02	35.3606	-120.65697
22	12/21/2018 11:17:08	6.20	5.29	30.98	35.3606	-120.65696
23	12/21/2018 11:17:13	7.88	7.12	39.39	35.36061	-120.65693
24	12/21/2018 11:17:18	9.02	7.88	45.09	35.36063	-120.65692
25	12/21/2018 11:17:23	8.51	6.86	42.54	35.36064	-120.6569
26	12/21/2018 11:17:28	5.86	4.87	29.31	35.36065	-120.65687
27	12/21/2018 11:17:33	6.67	5.14	33.35	35.36066	-120.65684
28	12/21/2018 11:17:38	7.13	5.78	35.66	35.36066	-120.65681
29	12/21/2018 11:17:43	8.68	7.02	43.39	35.36066	-120.65679
30	12/21/2018 11:17:48	8.07	5.46	40.35	35.36067	-120.65679
31	12/21/2018 11:17:53	8.13	6.05	40.64	35.36069	-120.65679
32	12/21/2018 11:17:58	7.86	5.65	39.31	35.36071	-120.65678
33	12/21/2018 11:18:03	6.24	5.30	31.20	35.36069	-120.65679

	A	B	C	D	E	F
34	12/21/2018 11:18:08	7.13	5.09	35.64	35.36068	-120.65676
35	12/21/2018 11:18:13	6.57	4.89	32.84	35.36065	-120.65674
36	12/21/2018 11:18:18	6.24	5.28	31.21	35.36064	-120.65672
37	12/21/2018 11:18:23	9.12	5.48	45.59	35.36062	-120.65669
38	12/21/2018 11:18:28	9.44	6.89	47.18	35.36059	-120.65667
39	12/21/2018 11:18:33	5.66	4.07	28.28	35.36055	-120.65665
40	12/21/2018 11:18:38	6.88	4.66	34.39	35.36052	-120.65663
41	12/21/2018 11:18:43	6.59	4.29	32.94	35.36053	-120.65664
42	12/21/2018 11:18:48	5.06	4.51	25.28	35.36057	-120.65667
43	12/21/2018 11:18:53	4.32	3.71	21.58	35.36061	-120.65669
44	12/21/2018 11:18:58	5.20	4.34	26.00	35.36065	-120.65671
45	12/21/2018 11:19:03	6.64	5.99	33.21	35.36072	-120.65674
46	12/21/2018 11:19:08	8.22	7.37	41.12	35.36076	-120.65678
47	12/21/2018 11:19:13	8.91	7.22	44.55	35.36078	-120.6568
48	12/21/2018 11:19:18	7.20	5.95	36.02	35.36083	-120.65682
49	12/21/2018 11:19:23	5.64	4.64	28.22	35.36087	-120.65683
50	12/21/2018 11:19:28	12.23	6.93	61.15	35.36091	-120.65685
51	12/21/2018 11:19:33	14.12	9.59	70.60	35.36093	-120.65681
52	12/21/2018 11:19:38	11.02	8.35	55.10	35.36089	-120.65678
53	12/21/2018 11:19:43	9.81	8.89	49.07	35.36087	-120.65675
54	12/21/2018 11:19:48	9.03	7.45	45.13	35.36084	-120.65672
55	12/21/2018 11:19:53	13.98	8.23	69.90	35.36083	-120.6567
56	12/21/2018 11:19:58	10.04	9.02	50.20	35.3608	-120.65672
57	12/21/2018 11:20:03	8.80	6.12	43.99	35.36078	-120.65671
58	12/21/2018 11:20:08	7.05	5.68	35.24	35.36075	-120.65669
59	12/21/2018 11:20:13	6.54	4.55	32.68	35.36072	-120.65671
60	12/21/2018 11:20:18	5.27	3.80	26.34	35.3607	-120.6567
61	12/21/2018 11:20:23	4.20	3.68	21.02	35.36067	-120.65666
62	12/21/2018 11:20:28	3.96	3.47	19.79	35.36063	-120.65664
63	12/21/2018 11:20:33	4.27	3.40	21.33	35.3606	-120.6566
64	12/21/2018 11:20:38	4.06	3.12	20.31	35.36056	-120.65656
65	12/21/2018 11:20:43	2.96	2.17	14.81	35.36051	-120.65656
66	12/21/2018 11:20:48	3.54	2.86	17.70	35.36043	-120.65655



	A	B	C	D	E	F
67	12/21/2018 11:20:53	3.81	3.44	19.05	35.36045	-120.65653
68	12/21/2018 11:20:58	3.84	3.17	19.19	35.3605	-120.65651
69	12/21/2018 11:21:03	3.15	2.58	15.73	35.36055	-120.65648
70	12/21/2018 11:21:08	2.93	2.50	14.66	35.36055	-120.65646
71	12/21/2018 11:21:13	3.01	2.52	15.04	35.36056	-120.6564
72	12/21/2018 11:21:18	3.24	2.56	16.21	35.36055	-120.65634
73	12/21/2018 11:21:23	2.61	2.03	13.05	35.36052	-120.6563
74	12/21/2018 11:21:28	3.17	2.30	15.85	35.36052	-120.65625
75	12/21/2018 11:21:33	3.33	2.81	16.66	35.36051	-120.6562
76	12/21/2018 11:21:38	4.77	3.09	23.87	35.36048	-120.65618
77	12/21/2018 11:21:43	2.74	2.24	13.70	35.36045	-120.65616
78	12/21/2018 11:21:48	3.09	2.29	15.43	35.36043	-120.65611
79	12/21/2018 11:21:53	3.27	2.83	16.33	35.36041	-120.65611
80	12/21/2018 11:21:58	3.55	3.02	17.74	35.36041	-120.65615
81	12/21/2018 11:22:03	3.12	2.64	15.59	35.36042	-120.6562
82	12/21/2018 11:22:08	3.33	2.65	16.64	35.3604	-120.65623
83	12/21/2018 11:22:13	3.33	2.86	16.64	35.36041	-120.65627
84	12/21/2018 11:22:18	3.58	2.97	17.92	35.3604	-120.65634
85	12/21/2018 11:22:23	3.28	2.82	16.41	35.36039	-120.65639
86	12/21/2018 11:22:28	2.59	2.07	12.93	35.36039	-120.65645
87	12/21/2018 11:22:33	1.72	1.15	8.62	35.36039	-120.65648
88	12/21/2018 11:22:38	4.46	2.16	22.30	35.36035	-120.65645
89	12/21/2018 11:22:43	3.87	2.60	19.33	35.36032	-120.65646
90	12/21/2018 11:22:48	4.15	2.45	20.77	35.36029	-120.65642
91	12/21/2018 11:22:53	6.65	4.04	33.27	35.36026	-120.65641
92	12/21/2018 11:22:58	8.66	5.29	43.28	35.36024	-120.65637
93	12/21/2018 11:23:03	7.78	5.89	38.89	35.36023	-120.6563
94	12/21/2018 11:23:08	6.89	4.96	34.47	35.36019	-120.65624
95	12/21/2018 11:23:13	8.95	5.90	44.77	35.36021	-120.65624
96	12/21/2018 11:23:18	5.77	3.84	28.86	35.36026	-120.65622
97	12/21/2018 11:23:23	5.16	3.56	25.79	35.36027	-120.65622
98	12/21/2018 11:23:28	3.55	2.72	17.74	35.36029	-120.6562
99	12/21/2018 11:23:33	3.36	2.42	16.79	35.36033	-120.65617


	A	B	C	D	E	F
100	12/21/2018 11:23:38	2.55	2.32	12.76	35.36034	-120.65617
101	12/21/2018 11:23:43	2.55	2.17	12.75	35.36036	-120.65615
102	12/21/2018 11:23:48	2.21	1.68	11.04	35.36039	-120.65614
103	12/21/2018 11:23:53	2.85	2.04	14.26	35.36042	-120.65614
104	12/21/2018 11:23:58	2.82	2.42	14.12	35.36043	-120.65619
105	12/21/2018 11:24:03	3.02	2.44	15.10	35.36043	-120.65624
106	12/21/2018 11:24:08	3.30	2.83	16.52	35.36042	-120.65628
107	12/21/2018 11:24:13	3.11	2.75	15.55	35.3604	-120.65631
108	12/21/2018 11:24:18	3.86	2.73	19.29	35.36037	-120.65636
109	12/21/2018 11:24:23	2.97	2.46	14.86	35.36037	-120.65642
110	12/21/2018 11:24:28	2.15	1.76	10.73	35.36037	-120.65647
111	12/21/2018 11:24:33	1.81	1.08	9.04	35.36036	-120.65649
112	12/21/2018 11:24:38	1.51	1.02	7.57	35.36033	-120.65647
113	12/21/2018 11:24:43	1.89	1.23	9.45	35.36029	-120.6565
114	12/21/2018 11:24:48	2.34	1.64	11.72	35.36026	-120.65654
115	12/21/2018 11:24:53	2.87	1.65	14.37	35.36024	-120.65659
116	12/21/2018 11:24:58	2.79	2.02	13.93	35.36023	-120.65657
117	12/21/2018 11:25:03	3.14	1.87	15.71	35.36023	-120.65655
118	12/21/2018 11:25:08	7.45	4.40	37.24	35.36023	-120.65654
119	12/21/2018 11:25:13	10.82	5.47	54.10	35.36019	-120.65647
120	12/21/2018 11:25:18	8.14	4.31	40.72	35.36015	-120.65644
121	12/21/2018 11:25:23	7.02	4.26	35.12	35.36014	-120.65639
122	12/21/2018 11:25:28	8.50	6.79	42.52	35.36013	-120.65634
123	12/21/2018 11:25:33	10.74	6.63	53.70	35.36014	-120.65634
124	12/21/2018 11:25:38	7.81	5.05	39.05	35.36016	-120.65639
125	12/21/2018 11:25:43	6.34	4.21	31.69	35.36018	-120.65643
126	12/21/2018 11:25:48	4.25	2.55	21.26	35.36015	-120.65649
127	12/21/2018 11:25:53	1.78	1.30	8.88	35.36014	-120.65654
128	12/21/2018 11:25:58	2.71	1.44	13.53	35.36016	-120.65658
129	12/21/2018 11:26:03	2.56	2.05	12.78	35.36018	-120.65661
130	12/21/2018 11:26:08	2.66	2.10	13.30	35.36019	-120.65665
131	12/21/2018 11:26:13	1.47	1.21	7.33	35.36019	-120.65662
132	12/21/2018 11:26:18	3.58	2.30	17.89	35.3602	-120.65656

	A	B	C	D	E	F
133	12/21/2018 11:26:23	6.57	4.10	32.85	35.36018	-120.65651
134	12/21/2018 11:26:28	4.14	2.36	20.71	35.36017	-120.65648
135	12/21/2018 11:26:33	3.12	2.08	15.58	35.36017	-120.65651
136	12/21/2018 11:26:38	2.18	1.67	10.92	35.36018	-120.65655
137	12/21/2018 11:26:43	2.42	1.91	12.11	35.36018	-120.65659
138	12/21/2018 11:26:48	2.25	1.89	11.23	35.36019	-120.65665
139	12/21/2018 11:26:53	2.84	2.33	14.20	35.36021	-120.65669
140	12/21/2018 11:26:58	2.93	2.57	14.64	35.36021	-120.65671
141	12/21/2018 11:27:03	3.89	3.15	19.45	35.36023	-120.65673
142	12/21/2018 11:27:08	5.10	3.91	25.52	35.36024	-120.65677
143	12/21/2018 11:27:13	5.30	3.99	26.49	35.36023	-120.6568
144	12/21/2018 11:27:18	5.56	4.52	27.80	35.36025	-120.65678
145	12/21/2018 11:27:23	3.83	2.78	19.14	35.36026	-120.65675
146	12/21/2018 11:27:28	3.96	3.38	19.79	35.36028	-120.65671
147	12/21/2018 11:27:33	5.33	3.92	26.63	35.36028	-120.6567
148	12/21/2018 11:27:38	5.43	3.69	27.13	35.36031	-120.65668
149	12/21/2018 11:27:43	5.89	4.28	29.43	35.36034	-120.65668
150	12/21/2018 11:27:48	4.53	3.63	22.67	35.36036	-120.65673
151	12/21/2018 11:27:53	4.61	3.66	23.04	35.36037	-120.65676
152	12/21/2018 11:27:58	3.50	2.64	17.50	35.36037	-120.6568
153	12/21/2018 11:28:03	3.90	3.19	19.51	35.36037	-120.65684
154	12/21/2018 11:28:08	3.72	2.98	18.58	35.36038	-120.65688
155	12/21/2018 11:28:13	3.60	3.04	18.02	35.36038	-120.65692
156	12/21/2018 11:28:18	3.49	3.30	17.43	35.36041	-120.65697
157	12/21/2018 11:28:23	4.25	3.48	21.25	35.36039	-120.65699
158	12/21/2018 11:28:28	4.48	4.09	22.39	35.36036	-120.65698
159	12/21/2018 11:28:33	5.26	4.67	26.31	35.36034	-120.65696
160	12/21/2018 11:28:38	5.36	4.30	26.80	35.3603	-120.65693
161	12/21/2018 11:28:43	4.21	3.85	21.06	35.36029	-120.65691
162	12/21/2018 11:28:48	4.75	3.37	23.75	35.36027	-120.65689
163	12/21/2018 11:28:53	4.66	3.66	23.32	35.36027	-120.65686
164	12/21/2018 11:28:58	4.69	3.78	23.46	35.36028	-120.65683
165	12/21/2018 11:29:03	6.52	5.42	32.61	35.36027	-120.6568



# RF Measurement Locations

Legend

 Feature 1

