

**TECHNICAL EXHIBIT  
RE: CONTROLLED RF ENVIRONMENT  
MONTECITO FM, INC.**

Montecito FM, Inc. (“Montecito FM”) seeks to modify KJEE’s licensed facility for a change in antenna location. This technical exhibit provides documentation of compliance concerning radiofrequency (RF) exposure and demonstrates that the proposed minor change in licensed facility is categorically excluded from environmental processing under Section 1.1306. All information contained in this statement was determined in accordance with the FCC Rules.

KJEE is currently licensed to operate from an established antenna farm on Gibraltar Peak with 0.82 kW effective radiated power (ERP) at an antenna height of 5 meters above ground level (AGL).<sup>1</sup> This communications site is located at 3035 Gibraltar Road in Santa Barbara, California and it is owned and managed by Community Radio Inc. (“Community Radio”). As shown in Photo 1, the Gibraltar Peak communications site is situated on top of an isolated mountain ridge and the KJEE relocation proposal entails moving the station’s antenna from one structure to another within the confines of this multi-user site.

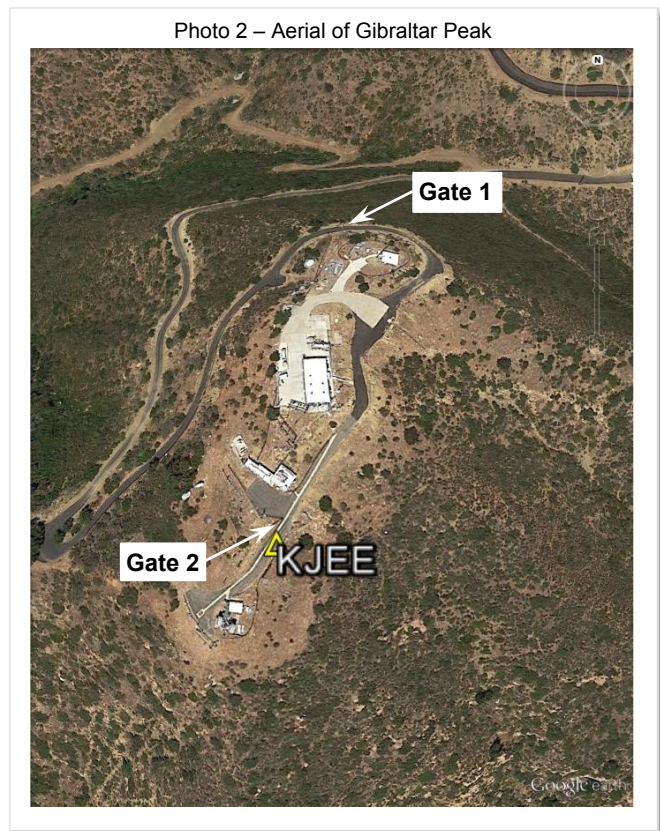


<sup>1</sup> Gibraltar Peak is located in the Santa Ynez Mountains and Los Padres National Forest in Santa Barbara County, CA. It is not an officially designated antenna farm. The licensed antenna coordinates for KJEE are specified in BLH-19940209KC as 34-27-57 N, 119-40-37 W.



Gibraltar Peak was significantly impacted by a forest fire several years ago and as a result KJEE is currently operating under special temporary authorization (STA) using a temporary antenna structure that was erected at the licensed antenna coordinates.<sup>2</sup> The station can now be moved in accordance with the National Forest and local county regulations to a permanent structure that was previously utilized by FM station KSBL, which at that time was licensed to operate a 1-bay ERI Rototiller Series antenna with 0.99 kW ERP at a height of radiation center above ground level of 6 meters.<sup>3</sup> Montecito FM's proposal specifies the same antenna height for KJEE, but at the slightly lower ERP of 0.842 kW. It is noted that KJEE will employ a 1-bay ERI Rototiller Series antenna, which is an EPA Type 3 radiator.

Access by the general public is restricted. The roadway to the site is blocked by a locked gate and security fencing and warning signs are in place along all public roads and on all accessible slopes. In the south section of the site where KJEE will be relocated, additional fencing and a second locked gate are used to further restrict access. The locations of the two gates are depicted in Photo 2. This image also shows the mountainous nature of the site. As can be observed in Photo 3 below, there are signs posted at the first gate to prohibit trespassing and to establish public awareness of the potential for RF exposure.



The site is also equipped with sufficient controls to prevent occupational exposure to RF fields in excess of the FCC guidelines (OET Bulletin 65, Edition 97-01). Specifically,

<sup>2</sup> BESTA-20150522AGD extends BSTA-20111130ICU, which specifies reduced power operation using a 1-bay antenna mounted at 5 meters AGL on a temporary structure erected at the licensed antenna coordinates of 34-27-57 N, 119-40-37 W.

<sup>3</sup> See BMLH-19991022ABO, Facility Id 35592, Channel 269A Carpinteria, California.



Community Radio has adopted a comprehensive RF site plan for implementing certain controls, including suitable barriers and RF safety signs, to alert site-users of the potential for exposure in excess of the FCC exposure guidelines. This plan is based on actual RF measurements and it is periodically updated to cover new station construction and changes to existing facilities. It indicates that personal RF exposure monitors are expected to be worn in all designated areas and prior to working on a supporting structure or in certain restricted areas, certain non-exempt stations must be contacted to reduce power or shut off their transmitters. Examples of the RF safety signs posted throughout the site are shown in Photos 3 thru 5 below.

Photo 3 – Gate 1



Photo 5 – Example of a posted warning sign



Photo 4 – Sign posted on a similar antenna structure





Because KJEE's transmitting antenna will be collocated on an existing structure within an established antenna farm, its facility does not fall within the criteria set forth in Section 1.1307(a) for certain types of facilities that may significantly affect the environment and for which additional environmental processing is required. Given that access by the general public is restricted and previous RF measurements of the former KSBL facility demonstrated compliance with the health and safety guidelines cited in Section 1.1307(b), it is anticipated that the relocation of KJEE will not significantly impact the current RF environment. A routine post construction update of Community Radio's comprehensive RF site plan will nevertheless be completed to accommodate the relocation. Accordingly, this minor change application is categorically excluded from environmental processing by Section 1.1306.

Prepared by,

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