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NONIONIZING RADIATION COMPLIANCE  
Northern Minnesota Public Television, Inc.  
Bemidji, MN

The proposed KAWE-DT maximized post-transition digital facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. This facility will operate on Channel 9 with an average effective radiated power of 27 kilowatts using the existing Harris TAB-12H nondirectional antenna which is presently used for analog operation by KAWE(TV). This antenna is mounted with its center of radiation 316 meters above ground level on an existing 329.1 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (27 kilowatts) for the expression  $[0.4ERP_v + ERP_A]$  in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Assuming, as a worst case, 100% downward radiation in conjunction with this equation yields a predicted worst case maximum power density of  $9.14 \mu\text{W}/\text{cm}^2$  at two meters above ground level. Since the permitted power density for uncontrolled exposure on Channel 9 is  $200 \mu\text{W}/\text{cm}^2$ , this amounts to only 4.57% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed KAWE-DT maximized post-transition digital facilities are excluded from environmental processing under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating compliance with this standard.

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Kawe-DT, in conjunction with other co-located and nearby stations, will continue to take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the total power density levels are in excess of the permitted level for controlled exposure.