

FCC Rule, Section 1.1307

The proposed 1000 kW operation will utilize the Dielectric, Type TFU-30GTH-R SPECIAL antenna (or equivalent) described above with a center of radiation above ground of 277.6 meters. The proposed two-stack antenna will be top-mounted on a modified self-supporting steel lattice tower with an overall height of 303 meters above ground.

As previously indicated, there are no AM stations located within 3.2 km of the proposed tower site. According to the FCC data base (October 23, 2001), the only station located within 100 meters is WTVQ-TV on the same tower. Also, WTVQ-DT is expected to locate on the same tower and is included in the RFF calculations below. The existing site and tower is owned by Media General Broadcasting, Inc., licensee of WTVQ-TV. According to the owner, access to the tower property is prevented by an eight foot security fence with a locked gate.

The proposed operation based upon the current OET Bulletin No. 65, Edition 97-01 dated August 1997 and Supplement A meets the provisions of the FCC radio frequency field ("RFF") guidelines, and thus, complies with Section 1.1307 of the FCC Rules. The elevation pattern for the Dielectric, Type TFU-30GTH R SPECIAL antenna [Exhibit E-2b] shows a maximum relative field of less than 0.06 toward the ground (50° to 90° below the horizontal). Calculation according to OST Bulletin 65 predicts a maximum RFF power density of less than $2 \mu\text{W}/\text{cm}^2$, 2 meters above ground or less than 0.5% of the uncontrolled (general public) Maximum Permissible Exposure ("MPE") guideline.

The licensed operation¹ of WTVQ-TV on Channel 36 utilizes an RCA, Type TFU-25G antenna with a center of radiation above ground of 293.5 meters. The manufacturer's published data indicate the relative field toward the ground in the vicinity of the tower (50° to 70° below the horizontal) does not exceed 0.1. Calculation according to OST Bulletin 65 as above predicts a maximum RFF power density of less than 5 $\mu\text{W}/\text{cm}^2$, 2 meters above ground or less than 1.2% of the uncontrolled (general public) MPE guideline.

The application² for WTVQ-DT (BPCDT-991025ADD) predicts an RFF contribution of WTVQ-DT of less than 1% the uncontrolled MPE guidelines. The total predicted RFF contribution (2 meters AGL) of the three stations expected to operate for the existing tower (WLEX-DT, WTVQ-DT and WTVQ-TV) is less than 3% of the uncontrolled (general public) MPE guidelines.

According to the applicant, RFF safety will be coordinated with the site owner. Authorized personnel and rigging contractors will be alerted to the potential zone of high radiation on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on or near the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

An environmental assessment (EA) is categorically excluded under Section 1.1307 of the FCC Rules and Regulations since the site owner and the licensee indicate that:

1The licensed facility of WTVQ(TV) (BLCT19800619IX) specifies 2240 kilowatts and 305 meters HAAT.

2The application for WTVQ(DT) (BPCDT19991025ADD) specifies 1000 kilowatts and 286 m HAAT.

- (a)(1) The existing facilities are not located in an officially designated wilderness area.
- (a)(2) The existing facilities are not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species and are not likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The existing facilities are not located near any known Indian religious sites.
- (a)(6) The existing facilities are not located in a flood plain.
- (a)(7) The installation of the DTV facilities on a modified tower at an existing site will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines. Authorized personnel will be alerted to areas unauthorized on the tower where potential radiation levels are in excess of the FCC guidelines. A security fence with a locked gate prevents unauthorized access to the tower site.