

Exhibit 31 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
The Audio House, Inc.
KZJK(FM) St. Louis Park, Minnesota
Facility ID 54425
Ch. 281C0 100 kW 315 m

The Audio House, Inc. (“Audio House”) is the licensee of radio station KZJK(FM), Ch. 281C1, St. Louis Park, Minnesota. KZJK(FM) is currently authorized⁵ to operate KZJK as a Class C1 station with an effective radiated power (“ERP”) of 89 kW at an antenna height above average terrain (“HAAT”) of 315 meters. Under the instant proposal, the KZJK facility will operate with an effective radiated power of 100 kW using its existing antenna system.

As a consequence of utilizing an existing antenna, no actual construction is proposed. With no change to the height of the existing structure (ASR 1022899), no change in current structure marking and lighting requirements is anticipated. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission’s rules.

Human Exposure to Radiofrequency Electromagnetic Field

The KZJK antenna support structure, located at Shoreview, Minnesota, is utilized by many FM and TV broadcasters. KZJK utilizes a community FM antenna system that supports eight other stations⁶. Other antennas on this structure are utilized by an additional FM station⁷ and four TV station facilities⁸ (both analog and digital). Additional FM and TV station antennas are located on other structures approximately 1.25 km from the KZJK site.

⁵ File Number BLH-19960411KC

⁶ In addition to KZJK, the Shoreview master antenna is utilized by: KQRS-FM (Ch. 223C, Golden Valley), KXXR(FM) (Ch. 229C, Minneapolis), KTCZ-FM (Ch. 246C, Minneapolis), KTIS-FM (Ch. 253C0, Minneapolis), KSJN(FM) (Ch. 258C, Minneapolis), KDWB-FM (Ch. 267C, Richfield), KEEY-FM (Ch. 271C, St. Paul) and WLTE(FM) (Ch. 275C0, Minneapolis), all in Minnesota.

⁷ KTLK-FM (Ch. 262C1, Minneapolis, MN)

⁸ KTCA-TV (Ch. 2 NTSC, Ch. 34 DTV, St. Paul), KMSP-TV (Ch. 9 NTSC, Ch. 26 DTV, Minneapolis), KTCI-TV (Ch. 17 NTSC, Ch. 16 DTV, St. Paul), and WFTC(TV) (Ch. 29 NTSC, Ch. 21 DTV, Minneapolis), all in Minnesota.

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KZJK Antenna - Maximum Contribution at 2 meters Above Ground Level

The proposed operation 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 limites 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 the cited guidelines.

The proposed KZJK antenna will have a center of radiation 316 meters above ground level. An ERP of 100 kilowatts, circularly polarized, will be employed. According to information retrieved from a representative of the applicant, the KZJK community antenna system consists of a twelve bay, Alan Dick & Co. Model F88-108C12.3SP260ND2. Access to the KZJK facility is restricted by means of warning signs and a fence. For the purpose of this study, "public access" will be considered the locations outside this locked fence.

As shown in **Exhibit 31 – Figure 4**, the maximum vertical plane relative field value in downward directions (between 20 and 90 degrees below the horizontal) does not exceed 25 percent. Thus a value of 25 percent relative field was used for this calculation.

The formula used for calculating FM signal density in this analysis is essentially the same as equation (10) in OET-65.

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

Where:

S	=	power density in microwatts/cm ²
F	=	relative field factor
ERP	=	total (horizontal and vertical polarization) ERP in Watts
D	=	distance in meters

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Using this formula and the assumptions above, the proposed KZJK facility contributes a power density of $4.2 \mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 2.1 percent of the general population/uncontrolled MPE limit of $200 \mu\text{W}/\text{cm}^2$. At ground level locations away from the base of the tower, the calculated RF power density attributable to the KZJK facility is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple emitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of various other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b).

Safety of Workers and the General Public

As demonstrated herein, the proposed facility will not result in exposure of the general public to RF levels in excess of the FCC's guidelines. Nevertheless, site access will continue to be restricted and controlled and RF exposure warning signs are posted.

With respect to worker safety, a site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on or near the antenna structures in areas where high RF levels may be present. 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. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. *Audio House* will continue to coordinate exposure procedures with all pertinent stations.

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Conclusion

Based on the preceding, it is believed that the proposed facility is in compliance with §1.1307(b).

RELATIVE FIELD

