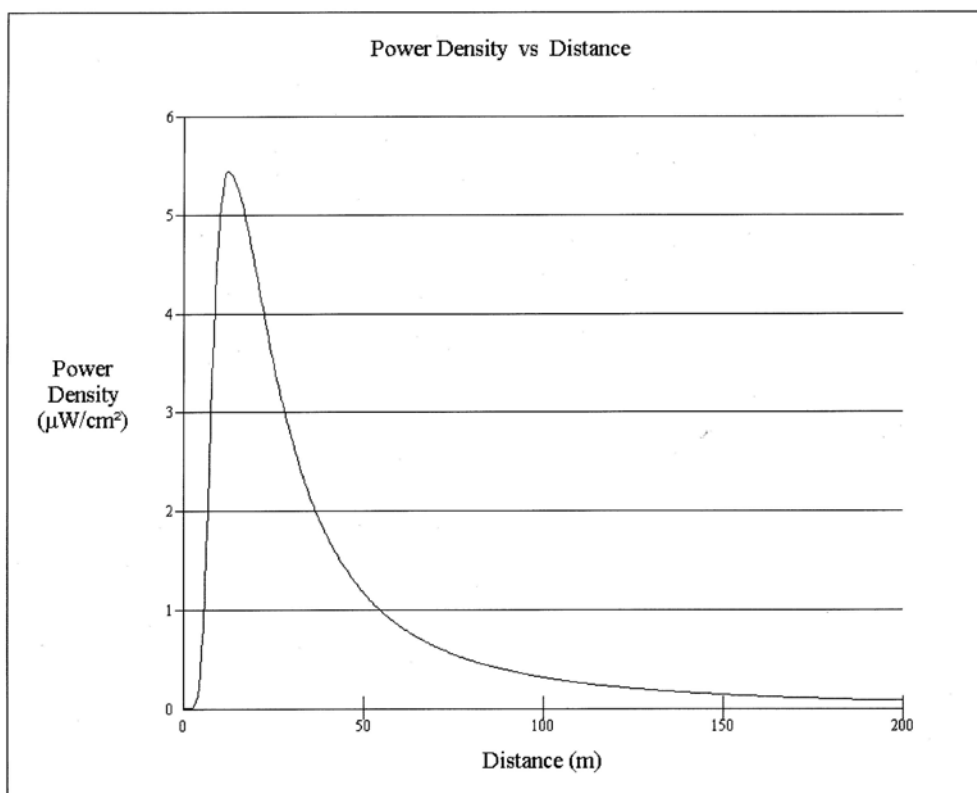


EXHIBIT 17

ENVIRONMENTAL PROTECTION ACT / NIER ANALYSIS

This proposal increases the ERP of the existing translator from 80 to 99 watts, with no other changes. The existing antenna consists of two Scala CL-FM/V log-periodic antennas in an 80/200 degree array. The antennas are mounted 10 meters above the ground on a 20 meter tower, near to the top of a ridge. The closest approach point is directly beneath it.

RF exposures were calculated using FM Model for Windows, Version 2.10, with factory-supplied elevation pattern data entered into the FM Model data files. As shown below, FM Model predicts a peak RF exposure of $5.4\mu\text{W}/\text{cm}^2$ at 12.4 meters from the tower base.



Office of Engineering and Technology	
Distance (m):	200
Antenna Type:	SCALA CLFMV Vertical Log Periodic Ant
Horizontal ERP (W):	0
Vertical ERP (W):	99
Antenna Height (m):	10
Number of Elements:	1
Element Spacing:	1

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This represents 2.7% of the Maximum Permissible Exposure (MPE) of $200\mu\text{w}/\text{cm}^2$ for uncontrolled environments. 47 CFR §1.1307(b)(3) exempts applicants from preparing an Environmental Assessment when the predicted exposure levels would be less than 5% of the FCC limits.

To cross-check the methodology, the formula outlined in OET Bulletin 97-01, August 1997, page 28, was used. Once again, elevation pattern data supplied by the antenna manufacturer was employed. Exposures were computed at 0.5m horizontal increments from the base of the tower, for points 2 meters above the ground. This resulted in a predicted peak exposure of $5.3\mu\text{w}/\text{cm}^2$, at 12 meters from the tower base - agreeing almost exactly with the results from FM Model.

Public access to the tower is restricted by a locked anti-climb device. If tower climbing by authorized personnel becomes necessary, transmitter power will be reduced or operation will cease, as necessary, so as to not exceed the RF exposure limits.

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