

SEARS TOWER

RFR COMPLIANCE STATEMENT

JUNE 2005

The rooftop areas of Sears Tower, include a significant telecommunications facility occupied and utilized by numerous two-way, land mobile, microwave, specialized use, radio broadcast and television broadcast stations.

The building identified and known as Sears Tower has been located in the downtown business district of Chicago since 1971. No identified issues relating to Section 1.1307(a) of the FCC Rules are known to exist.

This statement and attached exhibits respond to Section 1.1307(b) as it relates to Radio-Frequency operations at Sears Tower.

There is **no general public access whatsoever** to the rooftop areas of Sears Tower.

Sears Tower operates an observation "SkyDeck" open to the general public seven floors below the rooftop within the 103rd floor of the building, however this area is not exposed to any transmissions from any rooftop antenna or any significant or hazardous RF levels.

Access to the roof areas of Sears Tower is limited entirely to individuals having occupational assignments requiring such access. This access is strictly controlled by secured steel doors, photo-ID magnetic card monitoring and database systems, a key or magnetic card operated elevator and 24 hour a day video monitoring (for further roof access information refer to EXHIBIT #2 "ACCESS PROCEDURES").

Radio frequency radiation ("**RFR**") levels in all but one small localized area on the 109th floor roof are below the IEEE / ANSI standards, and with that single exception do not pose a hazard to persons performing occupational duties on the 109th floor roof for unlimited periods (for further radiation level information refer to EXHIBIT #1 "NON-IONIZING RADIATION SURVEY")

The RFR levels found in some areas of the west portion on the 110th floor roof and some areas above the 109th or 110th roof level on the steel tubes comprising the antenna bases and antenna poles will (during normal antenna operation) exceed the IEEE / ANSI standards, therefore, access to areas above the 109th floor roof level on the steel tubes comprising the antenna bases and antenna poles is **prohibited** whenever the RF levels exceed applicable IEEE / ANSI standards. For further antenna base and antenna pole access information refer to EXHIBIT #2, "ACCESS PROCEDURES". For further antenna tower RF radiation information refer to EXHIBIT #1 "NON-IONIZING RADIATION SURVEY".

ATTACHED EXHIBITS:

#1 NON-IONIZING RADIATION SURVEY

#2 ACCESS PROCEDURES

Non-Ionizing Radiation Survey

The following engineering statement has been prepared for Sears Tower Building Management, CB Richard Ellis (CBRE), and contains the results of a non-ionizing radiation survey performed on the 109th and 110th levels of Sears Tower in Chicago, Illinois.

Measurements were performed at the building on the 109th and 110th levels utilizing a Narda 8718 Radiation Survey System, with a Narda 8742 probe to measure the Electric Field and a Narda 8732 probe for measurement of the Magnetic Field on the dates of June 7-9, 2005. These measurements were performed in all areas of the 109th level, which is the main rooftop level, as well as the 110th level, which is the roof of the penthouse. At the time that the survey was performed, all broadcast transmitters were operating into their main antenna systems at full power. As a result, this antenna configuration represents the normal condition of the facilities located at the building.

The 109th and 110th level of Sears Tower is restricted to personnel having training in RF safety procedures as well as education in the hazards of exposure to RF radiation in excess of applicable standards. As a result, the controlled environment condition of the IEEE C95.1-1999 standard was utilized as the basis for the survey. Since there is no public access granted to these levels of the

building, the use of the controlled environment portion of the IEEE standard would be applicable.

Under normal conditions, the measured power density at the 109th level of Sears Tower does not exceed 100% of the controlled environment condition of IEEE C95.1-1999 at any location except some portions of an area in the southwest corner of this level. Within this small area, the measured power density exceeds 100%, although not significantly. This small restricted area under normal conditions is defined as a square which begins at the center of the southwest monopole extending south to the south edge of the building, thence west to the southwest corner of the building, thence north to a point at the west edge of the building due west of the southwest monopole, thence east to the starting point. Persons requiring access to this area must employ proper safety procedures and must remain in this area for a duration of no longer than 3 minutes unless personal protection is employed or personal monitoring devices indicate that the measured power density does not exceed the controlled environment condition.

Under normal conditions, the measured power density at the 110th level of Sears Tower does not exceed 100% of the controlled environment condition of IEEE C95.1-1999 in the eastern portion of this particular level. The area of the 110th level where the measured power density at some locations may exceed

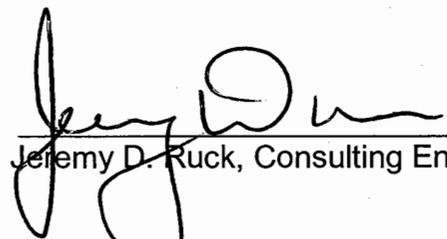
100% of the controlled environment condition is located to the west of a north to south line having as its origin the west edge of the 109th level overhead garage door and its conclusion directly south of this point at the south edge of the 110th level. Persons accessing areas to the east of this line would not be exposed to levels of radiation in excess of 100% of the controlled environment condition of IEEE C95.1-1999. To the west of this line, however, persons requiring access must employ personal monitoring devices and employ protection methods when the broadcast facilities are operating in normal conditions. It should be noted that access to the 110th level is further restricted due to the situation at this level. The ladder that accesses this level from the 109th level is locked, and only persons with extensive training in RF hazards and safety are permitted to access the ladder and the 110th level.

Within the equipment rooms at the 109th level, the measured power density does not exceed 20% of the controlled environment condition of IEEE C95.1-1999 at any location. As a result, persons may perform necessary duties at any location within this structure without exposure to harmful levels of radiation.

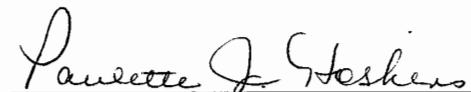
The other areas under consideration are the large antenna structures, specifically the East and West Towers and Cylinders, as well as the Northeast, Southeast, Northwest, and Southwest Monopoles. No access to either of the

eastern monopoles above the 110th level is permitted without employing existing building procedures to ensure facilities using antennas on these structures have ceased operation. Access to the western monopoles is further restricted. No access is granted above the 109th level without employing existing building procedures to ensure facilities having antennas on these structures have ceased operation. Access to the outside of the East Tower Cylinder is prohibited above the 110th level without employing building procedures as is access to the outside of the West Tower Cylinder above the 109th level. Access to internal areas of both cylinders and towers is restricted to those areas below the staging platforms at the top of the cylinder unless shutdown procedures have been implemented.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

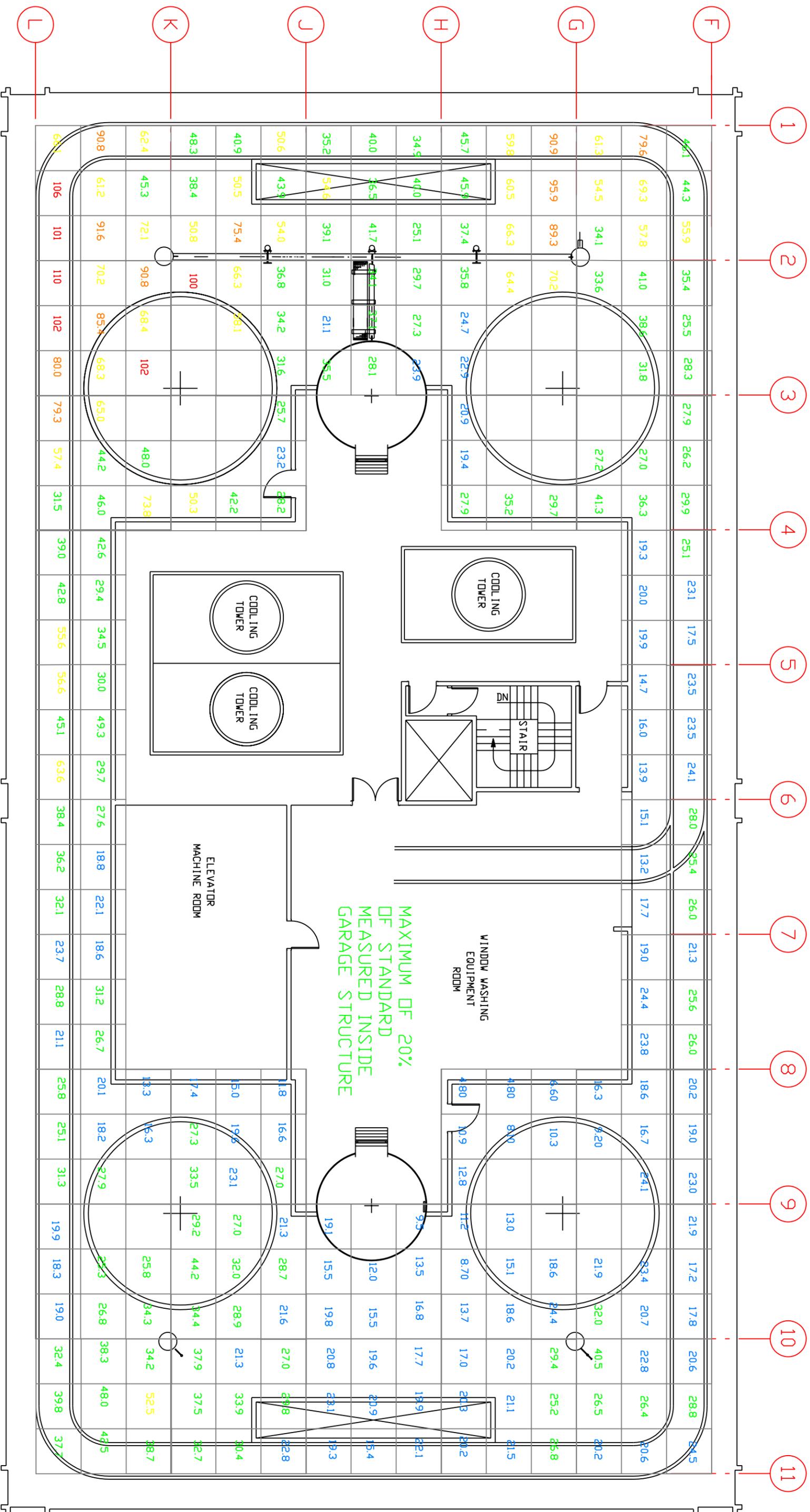

Jeremy D. Ruck, Consulting Engineer

Subscribed and sworn to before me this 20th Day of June, 2005.


Notary Public

My commission expires:





Notes:

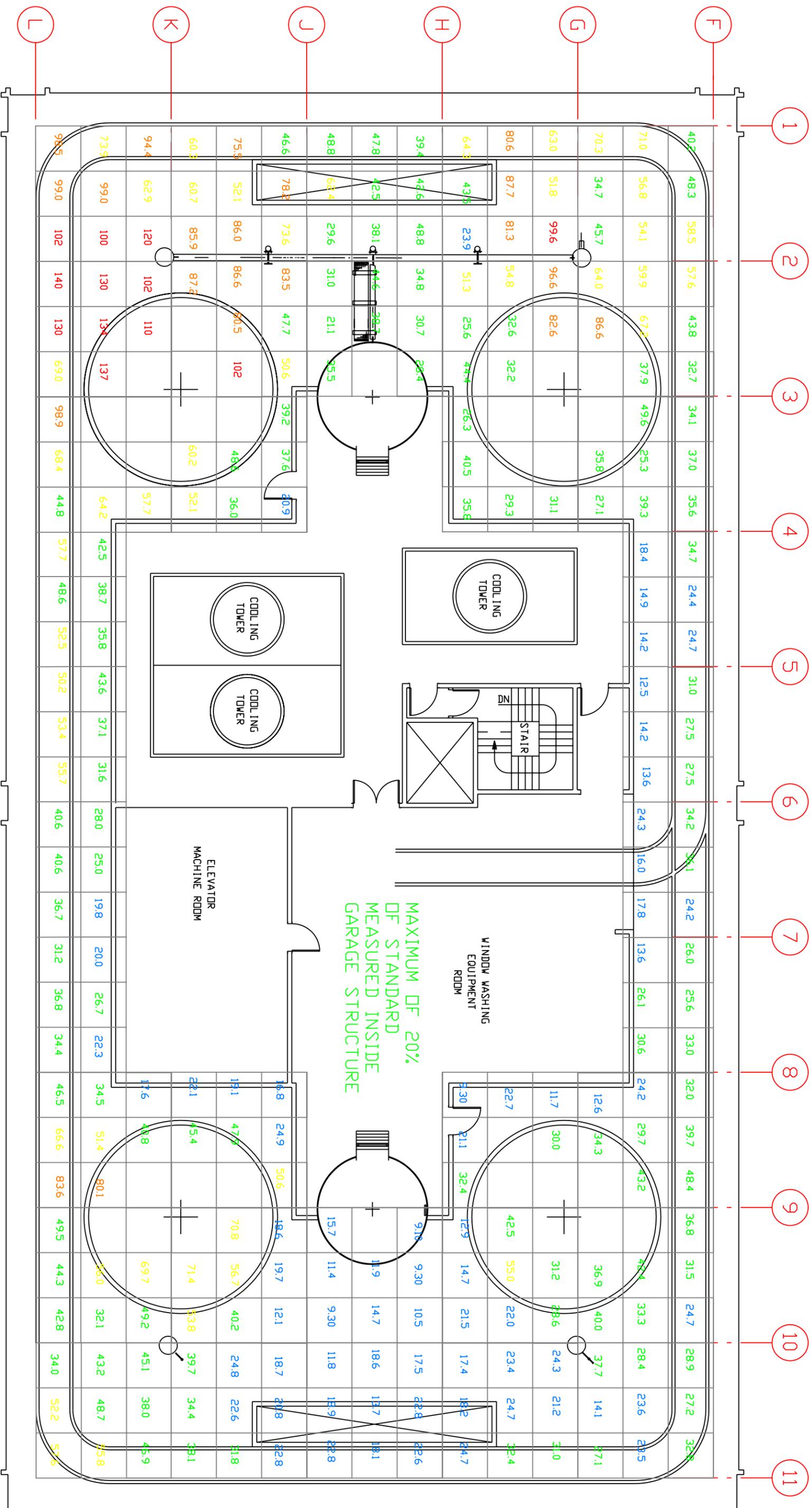
- Measured values are in Percentage of IEEE C95.1-1999.
- Controlled Environment Standard is Assumed due to Site Nature.
- Values Indicated are Uncorrected due to Multiple Emitters.
- Measured Values are Peak Readings in the Area Indicated.
- Narda 8718 Survey System Used.
- Narda 8742 Probe Utilized for E-Field Readings.
- Narda 8732 Probe Utilized for H-Field Readings.



A	B	C
D	E	F
G	H	I

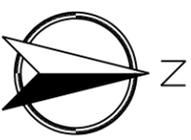
Measurement point coordinates determined by building columns with northwest corner of each grid square as reference. Within the building column grid squares (15' x 15') measurement locations are as per the diagram to the left.

	Sears Tower RFR Survey	
	CB Richard Ellis	
Measured E-Field Levels		
D.L. Matkley & Associates, Inc.		
Consulting Engineers, 2104 West More Ave., Peoria, Illinois 61604		
Drawn: SPAA	Scale: NTS	Sears Tower 109th Level
Revised: JDR	Rev: B	June, 2005
Approved: JDR		



Notes:

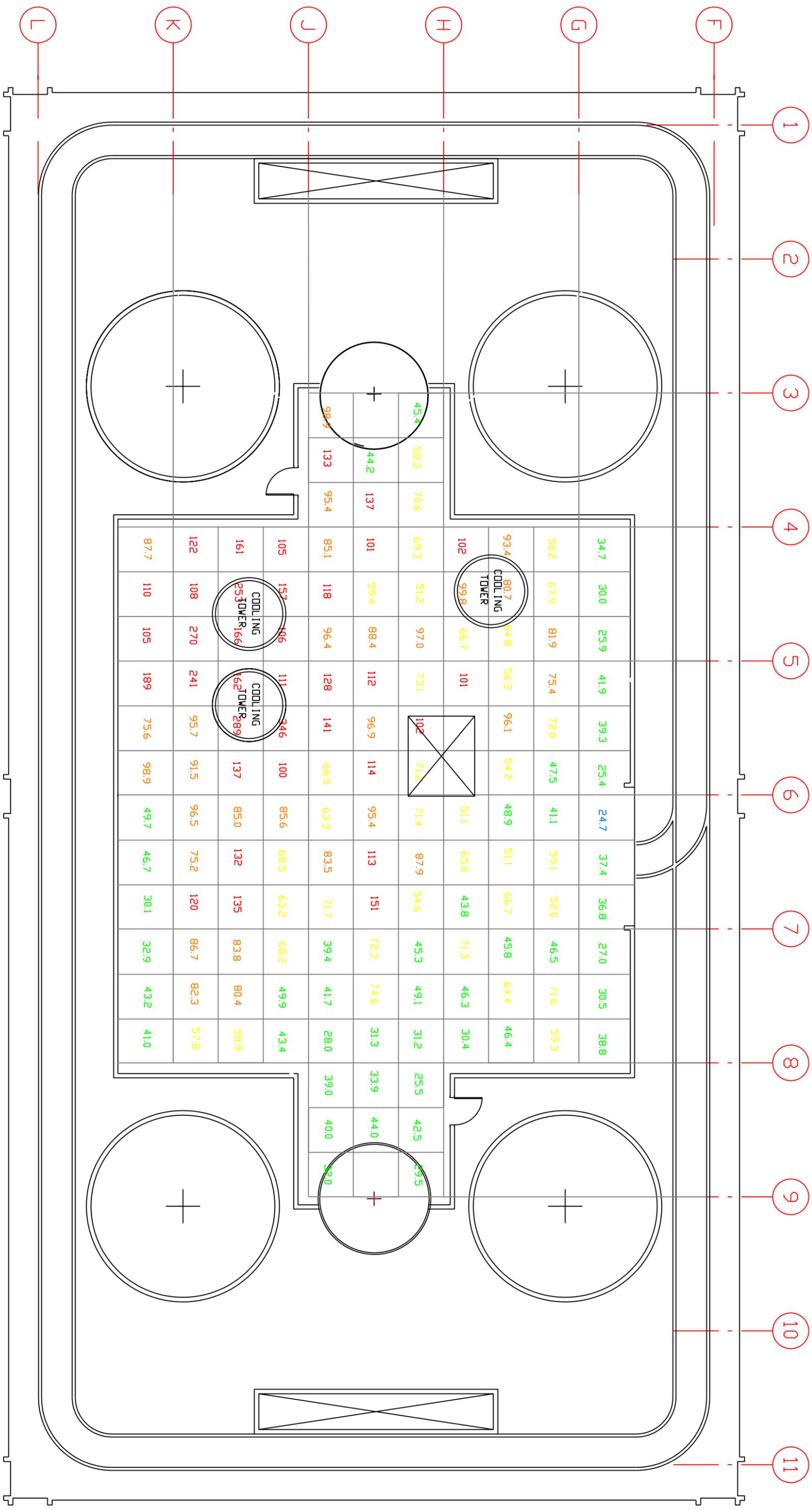
- Measured values are in percentage of IEEE C95.1-1999.
- Controlled Environment Standard is Assumed due to Site Nature.
- Values Indicated are Uncorrected due to Multiple Emitters.
- Measured Values are Peak Readings in the Area Indicated.
- Narda 8718 Survey System Used.
- Narda 8742 Probe Utilized for E-Field Readings.
- Narda 8732 Probe Utilized for H-Field Readings.



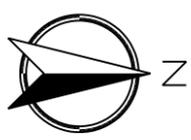
A	B	C
D	E	F
G	H	I

Measurement point coordinates determined by building columns with northwest corner of each grid square as reference. Within the building column grid squares (15' x 15') measurement locations are as per the diagram to the left.

	Sears Tower RFR Survey CB Richard Ellis Measured H-Field Levels	
	D.L. Markley & Associates, Inc. <small>Consulting Engineers, 2104 West Moss Ave., Peoria, Illinois 61604</small>	
Drawn: SPAA Revised: JDR Approved: JDR	Scale: NTS Rev: B	Sears Tower 1094th Level June, 2005



- Notes:
- Measured values are in percentage of IEEE C95.1-1999.
 - Controlled Environment Standard is Assumed due to Site Nature.
 - Values Indicated are Uncorrected due to Multiple Emitters.
 - Measured Values are Peak Readings in the Area Indicated.
 - Norda 8718 Survey System Used.
 - Norda 8742 Probe Utilized for E-Field Readings.
 - Norda 8732 Probe Utilized for H-Field Readings.

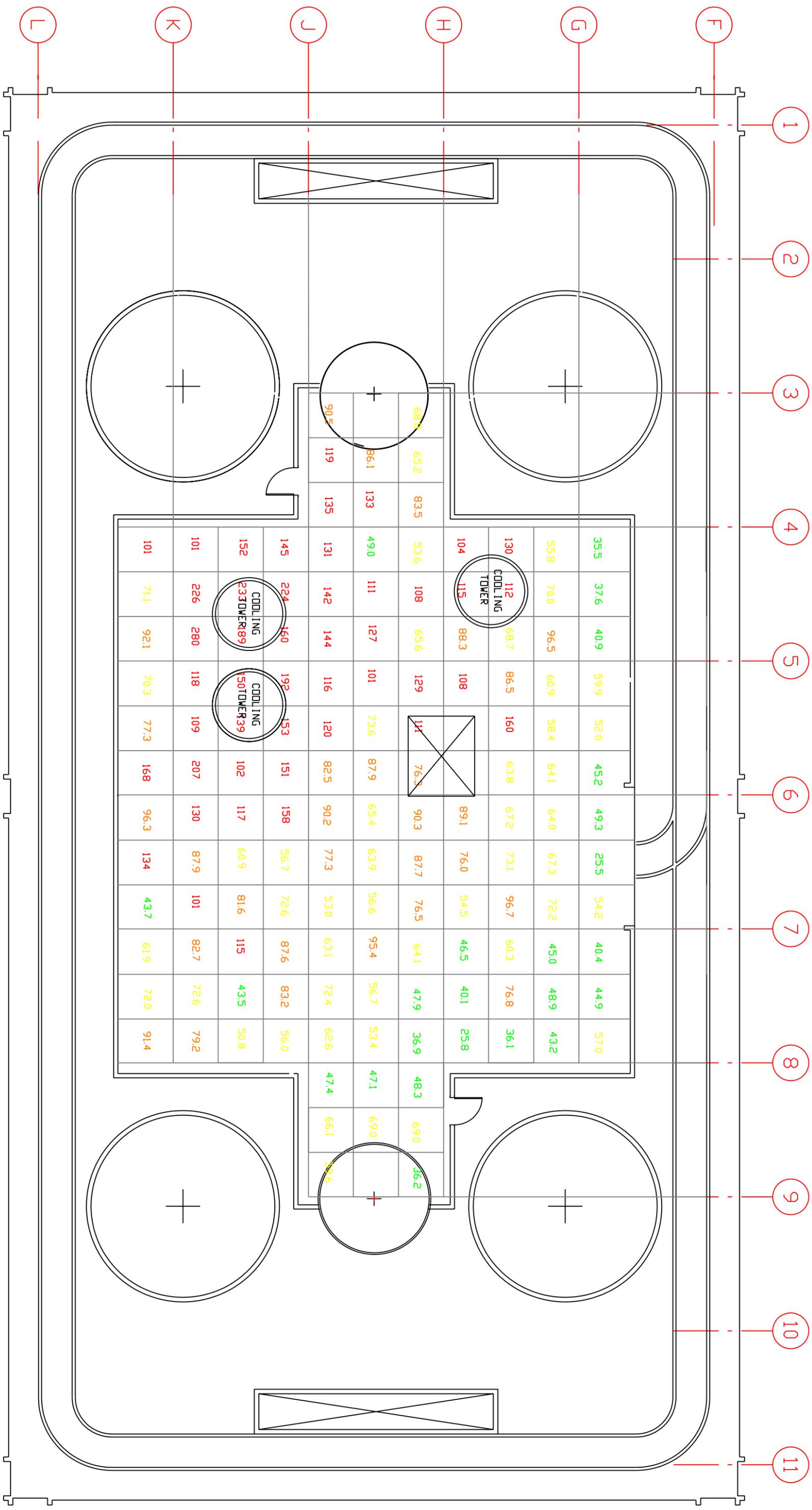


Measurement point coordinates determined by building columns with northwest corner of each grid square as reference. Within the building column grid squares (15' x 15') measurement locations are as per the diagram to the left. In F4-F7 and K4-K7 regions, measurements are gridded according to the diagram to the right.

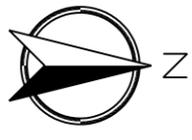
A	B	C
D	E	F
G	H	I

X	Y	Z
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	Sears Tower RFR Survey CB Richard Ellis Measured E-Field Levels	
	D.L. Markley & Associates, Inc. <small>Consulting Engineers, 2104 West Moss Ave., Peoria, Illinois 61604</small>	
Drawn: SPA Revised: JDR Approved: JDR	Scale: NTS Rev: B	Sears Tower 110th Level June, 2005



Notes:
 -Measured values are in percentage of IEEE C95.1-1999.
 -Controlled Environment Standard is Assumed due to Site Nature.
 -Values Indicated are Uncorrected due to Multiple Emitters.
 -Measured Values are Peak Readings in the Area Indicated.
 -Nordic 8718 Survey System Used.
 -Nordic 8742 Probe Utilized for E-Field Readings.
 -Nordic 8732 Probe Utilized for H-Field Readings.



Measurement point coordinates determined by building columns with northwest corner of each grid square as reference. Within the building column grid squares (15' x 15') measurement locations are as per the diagram to the left. In F4-F7 and K4-K7 regions, measurements are gridded according to the diagram to the right.

A	B	C
D	E	F
G	H	I

X	Y	Z
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	Sears Tower RFR Survey CB Richard Ellis Measured H-Field Levels	
	D.L. Markley & Associates, Inc. <small>Consulting Engineers, 2104 West Moss Ave., Peoria, Illinois 61604</small>	
Drawn: SPA Revised: JDR Approved: JDR	Scale: NTS Rev: B	Sears Tower 110th Level June, 2005

Sears Tower Rooftop Area Access Procedures

Floor Levels 109/110, and Antenna Bases or Antenna Poles

The rooftop levels 109 & 110 are restricted and controlled-access areas at Sears Tower. The only access to these areas is through a steel door which is locked, alarmed, and monitored by a security camera 24 hours a day, located on the 109th floor landing in emergency stairwell number one (1). The only people authorized access to this 109th floor level or above are:

- Sears Tower broadcast or telecommunications tenant employees possessing valid Sears Tower picture ID cards with 109 level access authorization designation.
- Contractor employees possessing valid Sears Tower contractor picture ID cards and authorized by Sears Tower building management to perform work in this area.
- Select individuals for whom access is requested in advance and approved by Sears Tower building management. These individuals must be accompanied to this area by a properly identified and knowledgeable Sears Tower broadcast or telecommunications tenant, contractor, or building management staff.

Initial access to the 109th floor landing is restricted by a special use elevator (#61), which can only be operated by a keyswitch and/or photo-ID card reader, and a secured passageway to stairwell #1. Keys and access via photo-ID card are issued selectively to Sears Tower broadcast and telecommunication tenants, specific contractors, and building management staff who are knowledgeable and authorized admittance to this area.

Access to the inside of the two main antenna bases is available (only by prior arrangement) to Sears Tower broadcast tenants, specific contractors, and building management staff through locked entry doors accessible on the 109th level.

109/110 Rooftop area — Specific Access Procedures

To comply with the Federal Communications Commission's (FCC) OST Bulletin # 65 Edition 97-01, dated August 1997, the following Access Procedures must be followed for admittance to the rooftop area and/or main antenna systems:

All authorized individuals requiring access to the 109/110 rooftop area must:

- possess the proper keys or a magnetic ID card with programming which allows access through the keyswitch and/or photo-ID card reader operated special use elevator, and the secured passageway
- present themselves at the 109th floor Security Control Point and establish contact with the Sears Tower Security Command Center via telephone or intercom
- "swipe" the individual's personal photo-ID through the magnetic card reader also located at the Security Control Point, so the access information stored in the building computer for that specific individual can be reviewed at the Command Center
- face the camera so the visual identity match verification can be made with the stored computer image of the individual assigned that specific ID card which is automatically displayed at the Security Command Center

If the preceding procedures confirm the individual has valid access to the secured area, the Security Command Center will electronically unlock the door to allow access to the roof areas.

EMERGENCY STANDBY ANTENNA USE

Broadcast tenants WZZN(FM), WLS-TV, WTTW(TV), WBBM-FM, and WJMK(FM) are required to notify the Sears Tower Security Command Center at (312) 875-7711 within two (2) minutes after a transfer from their main antenna to their auxiliary antenna for any reason. The caller must provide their name, station call letters, exact time of transfer, and approximate duration of the auxiliary antenna use. They must again notify the Sears Tower Security Command Center within two (2) minutes after a transfer back to their main antenna.

Access to the west half of the 109 roof or all of the 110 rooftop is prohibited anytime one or more of the auxiliary antennas are in use. If notification of an emergency transfer is received at the Security Command Center while individuals are on the 109 or 110 rooftops, these individuals will be directed to leave immediately by proceeding back through the Security Control Point at the 109th floor landing.

The non-emergency use (routine maintenance and testing) of the auxiliary antennas belonging to these five broadcasters will be confined to the hours between 1:00AM and 5:30 AM.

ANTENNA SYSTEM ACCESS

Access doors into the two 86 foot tall steel tubes that comprise the main antenna bases have tamper-resistant locks, and the waveguide/conduit pathways, have been equipped with tamper-resistant deadbolt locks. During normal broadcast operations, the RF radiation levels above the top of the antenna bases may exceed the maximum levels detailed in the FCC's OST Bulletin # 65. Access to this area is prohibited unless RF radiation is reduced to acceptable levels.

Entry into the areas above the 110 level on the Antenna Poles, above the 110 level on the outside of the antenna bases or the towers above the antenna bases is by special request only and is at the discretion of Sears Tower building management. **All** broadcast tenant lease and license agreements contain language requiring cooperation (specifically including reduction of power or cessation of transmissions) with other antenna system tenants during construction or maintenance operations.

Antenna system access may be requested by either of two ways. They are defined as follows:

- **Routine Antenna System Access** - for non-emergency repairs, preventive maintenance, testing and inspections. These activities will be restricted to the hours between 1:00AM and 5:30 AM.

Contact Sears Tower Office of the Building at (312) 875-0066 at least five (5) business days prior to the access time needed. Identify yourself and ask to speak to the Broadcast Facilities Manager regarding Routine Antenna System Access Procedures. Your call will be transferred to the Broadcast Facilities Manager, or returned as soon as the Broadcast Facilities Manager is available. This individual will work with you directly to schedule access times and will coordinate all activities necessary for safe access to the tower apertures above the antenna bases.

- **Emergency Antenna System Access** - for a failure that has caused a broadcaster to go off the air and/or threatens the broadcast capabilities of other tenants.

Contact Sears Tower Office of the Building at (312-875-0066 (during regular business hours) or Sears Tower Security Command Center at (312) 875-7711 (after regular business hours). After identifying yourself, inform the call taker that you want to initiate Emergency Antenna System Access Procedures. Be prepared to leave the phone number where you can be contacted. Your message will be conveyed to the Broadcast Facilities Manager, who will in turn contact you directly to make arrangements for safe access to the tower apertures above the antenna bases. Arrangements may require several hours to coordinate or, in some cases, may not be possible as specific broadcasters will have to be contacted and asked to switch to stand-by antennas, reduce power, or go off the air.

Under no condition will anyone be allowed access to the antenna poles, exterior antenna bases or main tower apertures until the accessed area RF radiation levels comply with FCC OST Bulletin #65.

BROADCAST FACILITIES MANAGEMENT

All questions or concerns related to the operation of the antenna site at Sears Tower should be directed to the Broadcast Facilities Manager. This individual is normally available during regular business hours by calling Sears Tower Office of the Building at (312) 875-0066 or Sears Tower Security at (312) 875-7711 after regular business hours.

The Broadcast Facilities Manager will coordinate any "shut down" or power reduction with each affected broadcast station. This coordination will include:

- written notification to each affected station of any scheduled shutdown
- verbal or written notification to each affected station of any emergency which requires a shutdown
- notification to each affected station control point of any cancellation of a shutdown
- direct, real-time verbal communication with each affected station's control point by either the RF Safety Contractor or the Broadcast Facilities Manager during the process of removing or reducing the station's carrier. This communication is not concluded until the station's control point operator verifies and confirms the status of the station's antenna radiation
- following the above control point communication with each affected station, and compliance with FCC OST Bulletin #65, the RF Safety Contractor will release the workers to enter and work in the specific areas above 110th floor roof or on or above the steel tubes comprising the antenna bases
- upon completion of work, and confirmation that all workers have exited any work areas requiring RF remediation, telephone communication with each affected station's control point is again initiated, advising the station operator that antenna tower work is complete and main antenna operations may resume
- upon departure of all persons involved in the antenna tower work, the Sears Tower Security Command Center is notified that the work is complete and the antenna bases are secured