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NONIONIZING RADIATION COMPLIANCE

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The proposed KNVN-DT post-transition DTV facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. The proposed facilities will operate with a maximum horizontally polarized average effective radiated power of 321 kilowatts and a maximum vertically polarized average effective radiated power of 29 kilowatts using an elliptically polarized Andrew ATW32H4-HSC-24S directional antenna that will be mounted with its center of radiation 293 meters above ground level on an existing 303.8 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin 65, details the calculation technique used to determine the power density at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed total average DTV effective radiated power (350 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. Based on a worst case assumption of 100% downward radiation, this equation yields a predicted a worst case power density at two meters above ground level of  $138.0 \mu\text{W}/\text{cm}^2$ . Since the maximum permitted power density for uncontrolled exposure on TV Channel 24 is  $355.3 \mu\text{W}/\text{cm}^2$ , this amounts to 38.9% of the permitted level for uncontrolled exposure. Since there are no other non-excluded RF sources located within one kilometer of the proposed KNVN-DT site, it is obvious that the proposed KNVN-DT post-transition facilities are in full compliance with this exposure standard.

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KNVN-DT will continue to take appropriate steps to insure that workers who must climb this tower will not be exposed to power density levels that are in excess of the permitted level for controlled exposure. These steps will include a reduction in power or the cessation of operation, as appropriate, at any time that workers must be on this tower in any area where the total power density levels exceed the permitted level for controlled exposure.