

## Exhibit 12

### Non-Interference Compliance

**Channel: 233**

Reference to: FCC File Number: BNPFT-20030828ADR (Original Construction Permit)  
Construction Permit W233AY (Current Call Sign)

### Description of Exhibit 12 Contents

This exhibit will show that the proposed facility complies with contour overlap interference protection provisions in 47 CFR 74.1204.

Specifically we will show compliance with 47 CFR 74.1204 (d), which states:

*“an application otherwise precluded by the section will be accepted if it can be demonstrated that no actual interference will occur due to interfering terrain, lack of population, or such other factors as may be applicable.”*

Page 3, Exhibit 12(a), is a table showing the second and third adjacent channel stations which the instant application must protect, and the actual field strengths of those stations at the proposed translator site. The field strengths were determined with ComStudy 2.2.

The applicant certifies that should any actual interference occur, operation of the translator will be suspended in accordance with 47 CFR 74.1203.

Page 4, Exhibit 12(b), displays the F(50/50) 60 dbu contour of the proposed channel 233 Translator modified transmitter site, overlapping the F(50/50) 60 dbu of the original W233AY Construction permit, thus compliance with CFR, 74.1233(a) (2).

Page 5, Exhibit 12(c), is a Table showing the distance to the F (50/50) 60 dbu contour of the Proposed 94.5 Translator, prepared using ComStudy 2.2.

Page 7, Exhibit 12(d), is a Topographical map of the area around the proposed channel 233 translator site, and a distance calculation to the nearest residence. The site, is off Newfound Road, in New Hampton, New Hampshire. Newfound Road is a greater distance away than the nearest residence, thus of no impact to the instant application.

Since the proposed channel 233 translator is about 152 kilometers from the Canadian Border, the applicant certifies that the 50/10, 34 dbu contour does not extend beyond 60 kilometers in any direction, in compliance with CFR 47, Sec. 74.1235 (d)3, which states that “the distance to the 34 dbu interfering contour may not exceed 60 kilometers in any direction”, and hence is in compliance with 47 CFR 74.1204(h). (see page 8, Exhibit 12(e).

### **Explanation of ComStudy Frequency Finder Results:**

The Interference analysis for the instant application was performed using data taken directly from the FCC's FM database, which looks for prohibited overlap with contours of adjacent stations, and prohibited proximity to stations 53 or 54 channels from the proposed translator station (IF) using 3 arc second terrain data and the FCC's contour algorithms. See results of analysis in Table on Page 10, Exhibit 12(F). (ComStudy uses the FCC's FM Database, thus the results included the proposed translator. This line was deleted from the Table to save confusion)

The proposed channel 233 Translator can operate with an effective radiated power of 150 watts at 7-meters AGL. (see page 4, Exhibit 12(b) Contour Study) According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2<sup>nd</sup>/3<sup>rd</sup> adjacent stations is 40 dbu, making the proposed translator's interfering contour 107.5 dbu F(50/10) See Contour Study, page 11, Exhibit 12(g).

Based on the FCC's "Free Space" equation, the F(50/10) 117.8 dbu interfering contour extends 362 meters. (see page 12, Exhibit 12(h) FCC Propagation Curves Calculation.) The nearest Residence is 370.1 meters distant, thus the proposed ch. 233 Translator has adequate cylindrical clearance.

The instant application takes into account USGS quadrangles and relevant aerial photography in stating that no inhabited structures exist inside the area of the interfering contour. Thus, in accordance with 47 CFR 74.1204(d), and the clarification provided by the FCC in the decision Re: Living Way Ministries (FCC 02-244), there is a lack of population within the proposed area of interference, and therefore this application is in full compliance with 47 CFR 74.1204.)

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). (See page 13, Exhibit 12(i), RF Worksheet)

**Table of 2nd & 3rd Adjacent Protected Stations  
Signal Strength at Proposed Translator Transmitter site**

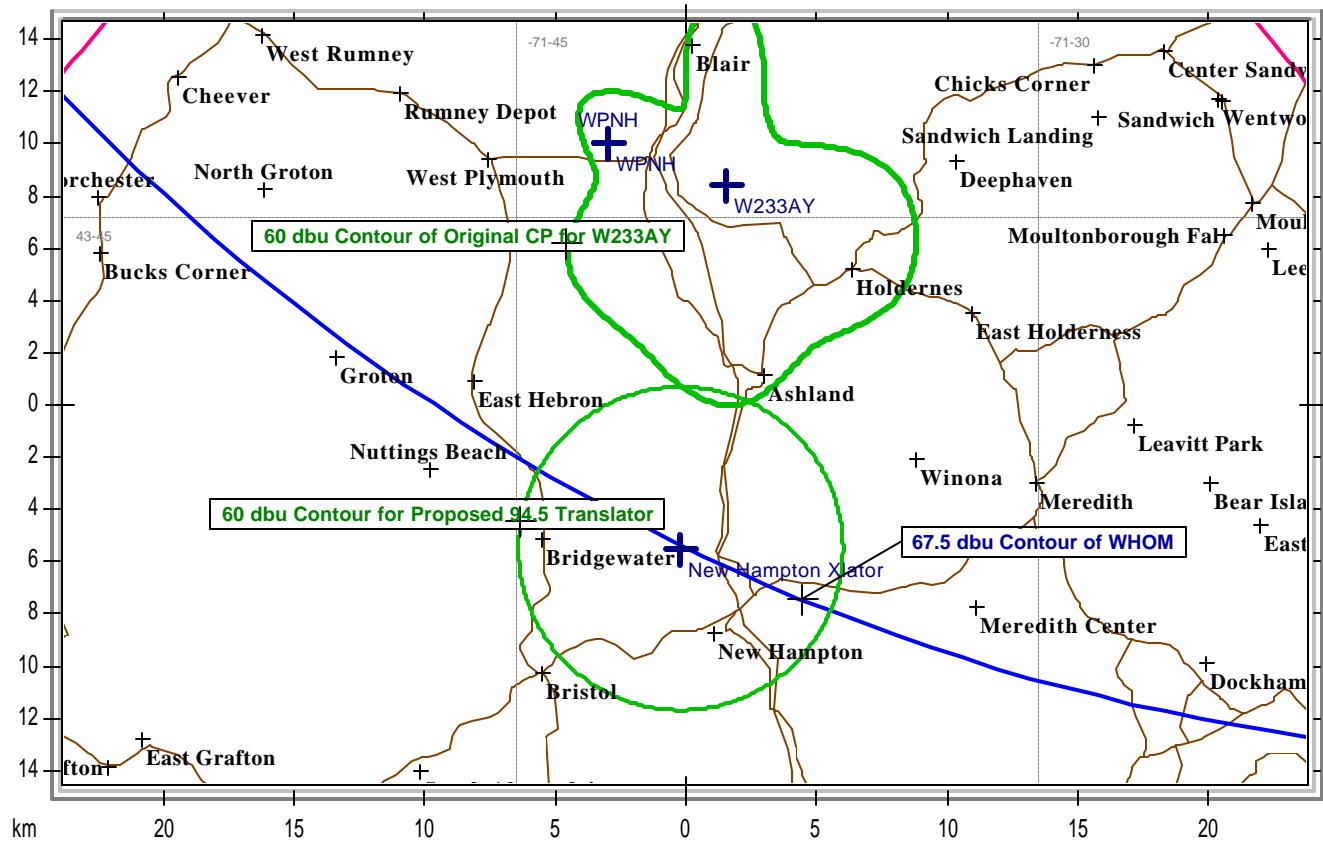
<u>Call Sign</u>	<u>State</u>	<u>City</u>	<u>Freq.</u>	<u>Channel</u>	<u>ERP-Watts</u>	<u>Class</u>	<u>Status</u>	<u>Distance, Km</u>	<u>Signal Strength at Prop. Site</u>
WHOM	NH	MT. WASHINGTON	94.9	235	48,000	C	LIC.	76.45	67.5

Minimum F(50/50) Protected Contour of Adjacent Station within Proposed Translator's standard F(50/10) Interfering Contour:	<b>67.5</b>
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\*Note: The F(50/50) signal strength of all relevant 2nd and 3rd adjacent stations have been examined, and are listed in the above table. The last column shows the station's signal level at the proposed translator's tower site, as determined by ComStudy 2.2. The minimum F(50/50) contour within the proposed translator's standard F(50/10) contour was used to calculate the proposed translator's interfering contour, assuring minimum undesired-to-desired ratio of 40 db for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

***Thus, the proposed channel 233 calculated F(50/10) interfering contour will be 107.5 dbu.***

Proposed 94.5 Xlator could operate from this site at 150 Watts



\* Note that 60 dbu Contour of Proposed, Intersects 60 dbu of Original CP

State Borders      Highways      Lat/Lon Grid

# Proposed 94.5 Translator Distance toF ( 50/50) 60 dbu Contours

Site: New Hampton Xlator  
Coordinates: 43-38-05.0 N, 71-40-15.0 W  
Freq: 94.50000 MHz  
ERP: 150.00 W

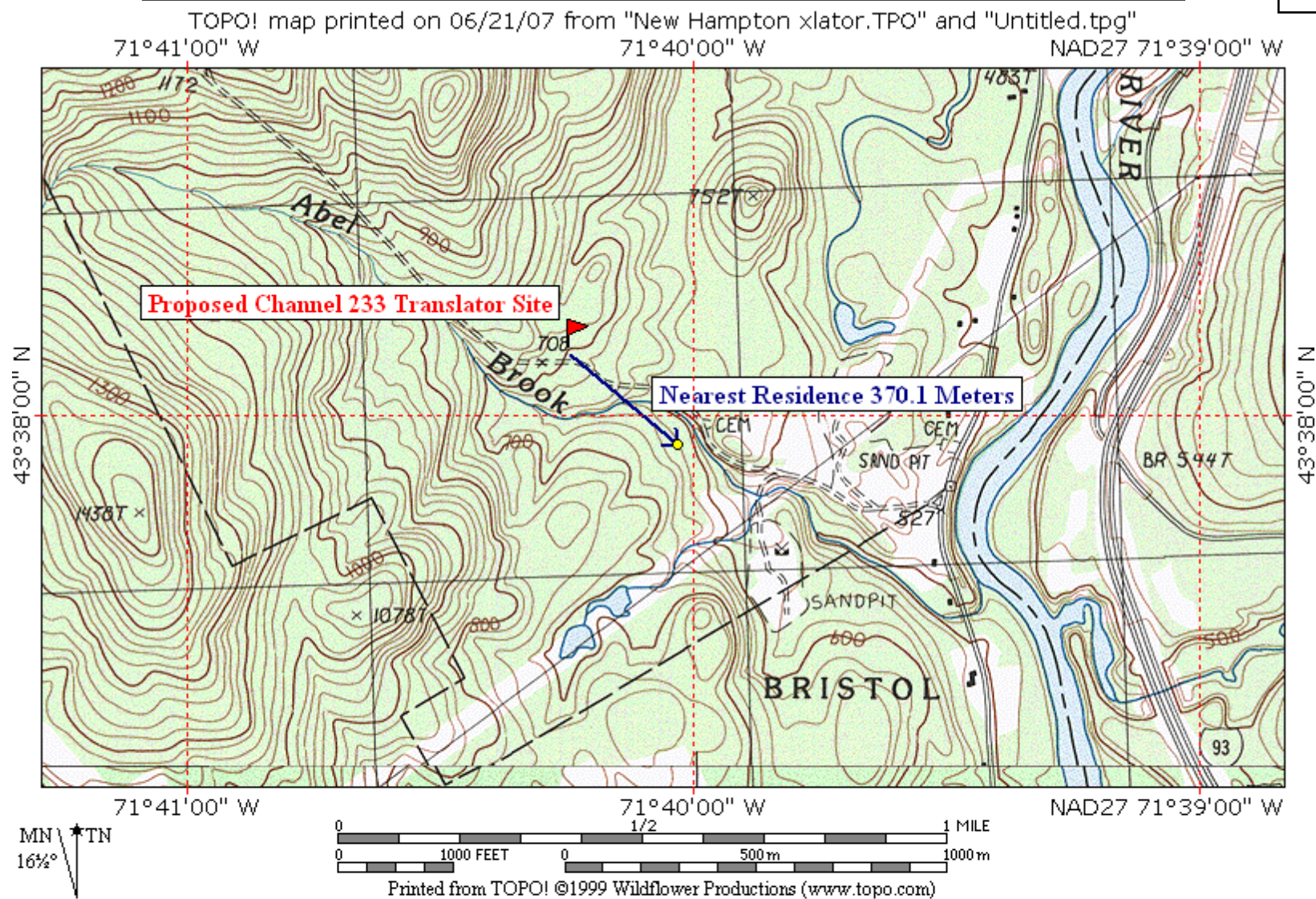
Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	150	13	150	6.25	43-41-27.2 N	71-40-15.0 W
5	150	6	460	6.25	43-41-27.2 N	71-40-10.1 W
10	150	-36	480	6.25	43-41-27.1 N	71-40-05.2 W
15	150	-22	660	6.25	43-41-27.0 N	71-40-00.3 W
20	150	20	560	6.25	43-41-26.7 N	71-39-55.4 W
25	150	7	670	6.25	43-41-26.5 N	71-39-50.6 W
30	150	0	670	6.25	43-41-26.1 N	71-39-45.7 W
35	150	-12	470	6.25	43-41-25.7 N	71-39-40.9 W
40	150	-17	440	6.25	43-41-25.3 N	71-39-36.0 W
45	150	-9	170	6.25	43-41-24.7 N	71-39-31.2 W
50	150	-12	100	6.25	43-41-24.2 N	71-39-26.4 W
55	150	-18	220	6.25	43-41-23.5 N	71-39-21.6 W
60	150	-39	480	6.25	43-41-22.8 N	71-39-16.8 W
65	150	-54	400	6.25	43-41-22.0 N	71-39-12.0 W
70	150	-35	450	6.25	43-41-21.2 N	71-39-07.3 W
75	150	-4	180	6.25	43-41-20.3 N	71-39-02.5 W
80	150	4	120	6.25	43-41-19.4 N	71-38-57.8 W
85	150	5	160	6.25	43-41-18.4 N	71-38-53.2 W
90	150	6	110	6.25	43-41-17.3 N	71-38-48.5 W
95	150	6	90	6.25	43-41-16.2 N	71-38-43.9 W
100	150	28	80	6.25	43-41-15.0 N	71-38-39.3 W
105	150	37	220	6.25	43-41-13.8 N	71-38-34.7 W
110	150	30	150	6.25	43-41-12.5 N	71-38-30.2 W
115	150	44	310	6.25	43-41-11.1 N	71-38-25.7 W
120	150	20	250	6.25	43-41-09.7 N	71-38-21.2 W
125	150	-30	190	6.25	43-41-08.3 N	71-38-16.7 W
130	150	-40	150	6.25	43-41-06.7 N	71-38-12.3 W
135	150	-40	150	6.25	43-41-05.2 N	71-38-08.0 W
140	150	-42	140	6.25	43-41-03.5 N	71-38-03.6 W
145	150	-28	140	6.25	43-41-01.8 N	71-37-59.3 W
150	150	-12	120	6.25	43-41-00.1 N	71-37-55.1 W
155	150	-12	150	6.25	43-40-58.3 N	71-37-50.9 W
160	150	-40	190	6.25	43-40-56.5 N	71-37-46.7 W
165	150	-50	170	6.25	43-40-54.6 N	71-37-42.6 W
170	150	-62	150	6.25	43-40-52.6 N	71-37-38.5 W
175	150	-52	110	6.25	43-40-50.6 N	71-37-34.5 W
180	150	-28	90	6.25	43-40-48.6 N	71-37-30.5 W
185	150	-3	120	6.25	43-40-46.5 N	71-37-26.6 W
190	150	18	120	6.25	43-40-44.3 N	71-37-22.8 W
195	150	10	130	6.25	43-40-42.1 N	71-37-18.9 W
200	150	18	210	6.25	43-40-39.9 N	71-37-15.2 W

205	150	22	200	6.25	43-40-37.6 N	71-37-11.5 W
210	150	10	240	6.25	43-40-35.2 N	71-37-07.8 W
215	150	-50	240	6.25	43-40-32.8 N	71-37-04.2 W
220	150	-36	330	6.25	43-40-30.4 N	71-37-00.7 W
225	150	4	160	6.25	43-40-27.9 N	71-36-57.2 W
230	150	22	190	6.25	43-40-25.4 N	71-36-53.8 W
235	150	-18	250	6.25	43-40-22.9 N	71-36-50.4 W
240	150	-62	260	6.25	43-40-20.2 N	71-36-47.1 W
245	150	-84	260	6.25	43-40-17.6 N	71-36-43.9 W
250	150	-106	280	6.25	43-40-14.9 N	71-36-40.7 W
255	150	-96	280	6.25	43-40-12.2 N	71-36-37.6 W
260	150	-80	280	6.25	43-40-09.4 N	71-36-34.6 W
265	150	-88	290	6.25	43-40-06.6 N	71-36-31.6 W
270	150	-58	320	6.25	43-40-03.8 N	71-36-28.7 W
275	150	-54	280	6.25	43-40-00.9 N	71-36-25.9 W
280	150	-68	350	6.25	43-39-58.0 N	71-36-23.1 W
285	150	-110	460	6.25	43-39-55.1 N	71-36-20.4 W
290	150	-73	360	6.25	43-39-52.1 N	71-36-17.8 W
295	150	-46	340	6.25	43-39-49.1 N	71-36-15.3 W
300	150	-20	350	6.25	43-39-46.0 N	71-36-12.8 W
305	150	-60	430	6.25	43-39-42.9 N	71-36-10.4 W
310	150	-106	460	6.25	43-39-39.8 N	71-36-08.1 W
315	150	-155	430	6.25	43-39-36.7 N	71-36-05.8 W
320	150	-198	360	6.25	43-39-33.5 N	71-36-03.6 W
325	150	-204	340	6.25	43-39-30.4 N	71-36-01.6 W
330	150	-158	430	6.25	43-39-27.1 N	71-35-59.5 W
335	150	-128	460	6.25	43-39-23.9 N	71-35-57.6 W
340	150	-86	710	6.25	43-39-20.6 N	71-35-55.7 W
345	150	-55	890	6.25	43-39-17.4 N	71-35-53.9 W
350	150	-22	490	6.25	43-39-14.0 N	71-35-52.2 W
355	150	-8	340	6.25	43-39-10.7 N	71-35-50.6 W

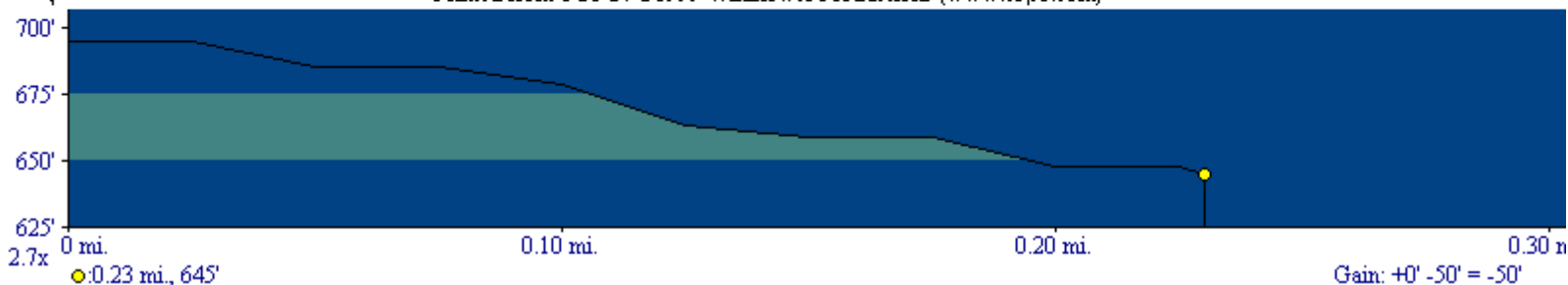


Study shows nearest residence is 370.1 Meters from Proposed Channel 233 Translator

Page 7.  
Exhibit 12 (d)



MN  
16 1/2°



# Proposed 94.5 Transaltor Distance to 50/10, 34 dBu Interfering Contour

Site: New Hampton Xlator  
Coordinates: 43-38-05.0 N, 71-40-15.0 W  
Freq: 94.50000 MHz  
ERP: 150.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	150	13	150	30.02	43-54-17.2 N	71-40-15.0 W
1	150	18	340	30.02	43-54-17.0 N	71-39-51.4 W
2	150	18	420	30.02	43-54-16.6 N	71-39-27.9 W
3	150	12	510	30.02	43-54-15.8 N	71-39-04.3 W
4	150	1	350	30.02	43-54-14.8 N	71-38-40.8 W
5	150	6	460	30.02	43-54-13.4 N	71-38-17.3 W
6	150	2	560	30.02	43-54-11.8 N	71-37-53.9 W
7	150	-6	520	30.02	43-54-09.9 N	71-37-30.5 W
8	150	-22	470	30.02	43-54-07.7 N	71-37-07.2 W
9	150	-26	470	30.02	43-54-05.1 N	71-36-43.9 W
10	150	-36	480	30.02	43-54-02.3 N	71-36-20.7 W
11	150	-32	510	30.02	43-53-59.2 N	71-35-57.5 W
12	150	-33	610	30.02	43-53-55.8 N	71-35-34.4 W
13	150	-33	670	30.02	43-53-52.1 N	71-35-11.4 W
14	150	-24	820	30.02	43-53-48.2 N	71-34-48.6 W
15	150	-22	660	30.02	43-53-43.9 N	71-34-25.8 W
16	150	-13	640	30.02	43-53-39.3 N	71-34-03.1 W
17	150	-4	670	30.02	43-53-34.5 N	71-33-40.5 W
18	150	8	600	30.02	43-53-29.4 N	71-33-18.1 W
19	150	19	600	30.02	43-53-24.0 N	71-32-55.8 W
20	150	20	560	30.02	43-53-18.3 N	71-32-33.6 W
21	150	20	510	30.02	43-53-12.3 N	71-32-11.5 W
22	150	21	580	30.02	43-53-06.1 N	71-31-49.6 W
23	150	20	570	30.02	43-52-59.5 N	71-31-27.9 W
24	150	11	630	30.02	43-52-52.7 N	71-31-06.3 W
25	150	7	670	30.02	43-52-45.7 N	71-30-44.9 W
26	150	0	680	30.02	43-52-38.3 N	71-30-23.7 W
27	150	-6	690	30.02	43-52-30.7 N	71-30-02.7 W
28	150	-4	670	30.02	43-52-22.9 N	71-29-41.8 W
29	150	-4	630	30.02	43-52-14.7 N	71-29-21.1 W
30	150	0	670	30.02	43-52-06.4 N	71-29-00.7 W
31	150	4	630	30.02	43-51-57.7 N	71-28-40.4 W
32	150	5	660	30.02	43-51-48.8 N	71-28-20.4 W
33	150	4	600	30.02	43-51-39.7 N	71-28-00.6 W
34	150	-4	580	30.02	43-51-30.3 N	71-27-41.0 W
35	150	-12	470	30.02	43-51-20.6 N	71-27-21.6 W
36	150	-12	460	30.02	43-51-10.7 N	71-27-02.5 W
37	150	-14	460	30.02	43-51-00.6 N	71-26-43.6 W
38	150	-21	520	30.02	43-50-50.2 N	71-26-25.0 W
39	150	-12	440	30.02	43-50-39.6 N	71-26-06.6 W
40	150	-17	440	30.02	43-50-28.8 N	71-25-48.5 W



41	150	-17	510	30.02	43-50-17.7 N	71-25-30.7 W
42	150	-10	380	30.02	43-50-06.5 N	71-25-13.1 W
43	150	-13	290	30.02	43-49-55.0 N	71-24-55.8 W
44	150	-14	290	30.02	43-49-43.2 N	71-24-38.8 W
45	150	-9	170	30.02	43-49-31.3 N	71-24-22.1 W
46	150	-10	140	30.02	43-49-19.2 N	71-24-05.6 W
47	150	-12	120	30.02	43-49-06.8 N	71-23-49.5 W
48	150	-12	110	30.02	43-48-54.3 N	71-23-33.7 W
49	150	-13	100	30.02	43-48-41.5 N	71-23-18.2 W
50	150	-12	100	30.02	43-48-28.6 N	71-23-03.0 W
51	150	-18	90	30.02	43-48-15.5 N	71-22-48.1 W
52	150	-20	100	30.02	43-48-02.1 N	71-22-33.5 W
53	150	-15	110	30.02	43-47-48.6 N	71-22-19.2 W
54	150	-14	140	30.02	43-47-35.0 N	71-22-05.3 W
55	150	-18	220	30.02	43-47-21.1 N	71-21-51.8 W
56	150	-20	280	30.02	43-47-07.1 N	71-21-38.5 W
57	150	-22	310	30.02	43-46-52.9 N	71-21-25.6 W
58	150	-32	380	30.02	43-46-38.6 N	71-21-13.1 W
59	150	-40	440	30.02	43-46-24.1 N	71-21-00.9 W
60	150	-39	480	30.02	43-46-09.4 N	71-20-49.0 W
61	150	-32	450	30.02	43-45-54.6 N	71-20-37.5 W
62	150	-38	450	30.02	43-45-39.7 N	71-20-26.4 W
63	150	-44	460	30.02	43-45-24.6 N	71-20-15.6 W
64	150	-54	360	30.02	43-45-09.4 N	71-20-05.2 W
65	150	-54	400	30.02	43-44-54.0 N	71-19-55.2 W
66	150	-40	340	30.02	43-44-38.6 N	71-19-45.6 W
67	150	-39	310	30.02	43-44-23.0 N	71-19-36.3 W
68	150	-36	390	30.02	43-44-07.3 N	71-19-27.4 W
69	150	-34	450	30.02	43-43-51.4 N	71-19-18.9 W
70	150	-35	450	30.02	43-43-35.5 N	71-19-10.7 W
71	150	-26	370	30.02	43-43-19.5 N	71-19-03.0 W

# Proposed Ch. 233 Translator. Frequency Separation Study

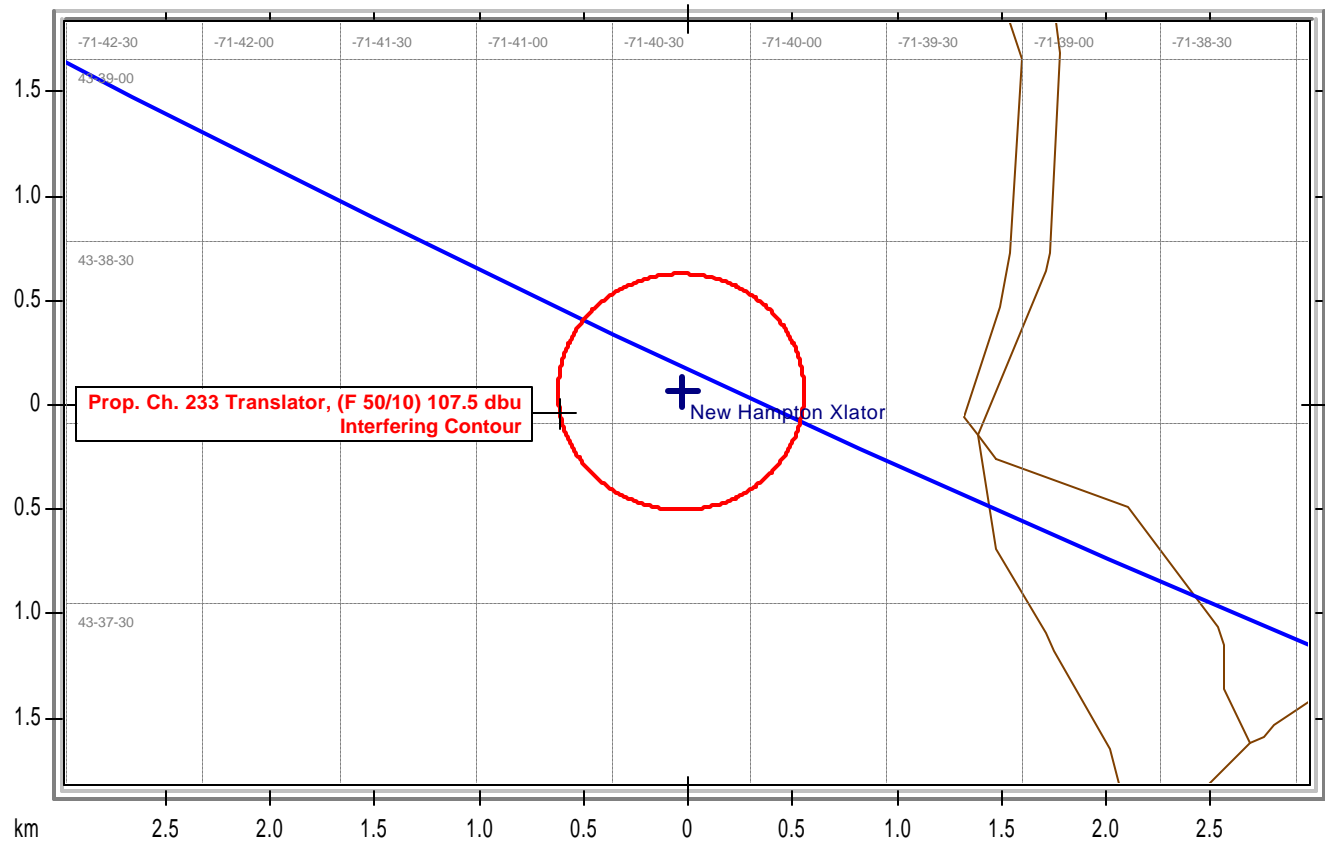
43-38-05 N, 71-40-15 W

HAAT= -33.4m

ERP= 150 watts

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
	VT	ALBANY	94.5	233	0	A	APP	135.58	0	28.11 dB
CITE-2	QU	SHERBROOKE	94.5	233	50	D		195.96	0	39.19 dB
NEW	NH	BERLIN	94.5	233	10	D	APP	104.4	0	20.22 dB
W232AJ	NH	GREENVILLE, ETC.	94.3	232	5	D	LIC	87.99	0	31.23 dB
W232AP	VT	WHITE RIVER JUNCTION	94.3	232	10	D	LIC	50.41	0	25.15 dB
W232BN	VT	WARREN	94.3	232	170	D	CP	109.6	0	35.71 dB
W233AR	VT	BRATTLEBORO	94.5	233	10	D	LIC	116.98	0	22.25 dB
W233BD	VT	BURLINGTON	94.5	233	10	D	CP	146.83	0	29.98 dB
W233BE	ME	RICHMOND CENTER	94.5	233	250	D	LIC	149.94	0	27.76 dB
W234BD	VT	BOLTON	94.7	234	10	D	CP	129.6	0	38.24 dB
WBOE	NY	RAVENA	94.5	233	3000	A	APP	215.3	0	37.32 dB
WBOE	NY	RAVENA	94.5	233	3000	A	LIC	215.3	0	37.32 dB
WBOE	NY	RAVENA	94.5	233	6000	A	CP	215.47	0	35.46 dB
WCNH-LP	NH	CONCORD	94.7	234	100	LP100	LIC	47.76	13	22.01 dB
WCYI	ME	LEWISTON	93.9	230	27500	B	LIC	144.03	0	26.95 dB
WCYY	ME	BIDDEFORD	94.3	232	0	B1	USE	98.85	0	32.25 dB
WCYY	ME	BIDDEFORD	94.3	232	11500	B1	LIC	102.77	0	21.78 dB
WFTN-FM	NH	FRANKLIN	94.1	231	0	A	USE	18.72	0	18.97 dB
WFTN-FM	NH	FRANKLIN	94.1	231	6000	A	LIC	18.72	0	3.14 dB
WHJY	RI	PROVIDENCE	94.1	231	50000	B	LIC	202.24	0	35.48 dB
WHOM	NH	MOUNT WASHINGTON	94.9	235	20500	C	LIC	76.47	0	-6.44 dB
WHOM	NH	MOUNT WASHINGTON	94.9	235	20500	C	CP	76.44	0	-6.46 dB
<b>WHOM</b>	<b>NH</b>	<b>MOUNT WASHINGTON</b>	<b>94.9</b>	<b>235</b>	<b>48000</b>	<b>C</b>	<b>LIC</b>	<b>76.45</b>	<b>0</b>	<b>-10.10 dB</b>
WJEN	VT	RUTLAND	94.5	233	0	A	USE	102.76	0	22.25 dB
WJEN	VT	RUTLAND	94.5	233	700	A	CP	108.3	0	21.25 dB
WJEN	VT	RUTLAND	94.5	233	3000	A	LIC	109.44	0	21.25 dB
WJMN	MA	BOSTON	94.5	233	0	B	USE	151.88	0	25.80 dB
WJMN	MA	BOSTON	94.5	233	9200	B	LIC	151.88	0	13.19 dB
WKSQ	ME	ELLSWORTH	94.5	233	11500	B	LIC	270.42	0	34.92 dB

Proposed 94.5 Xlator could operate from this site at 150 Watts



\* Note: There are no residences or buildings within the Interfering Contour

State Borders      Highways      Lat/Lon Grid



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## Audio Division

## FM and TV Propagations Curves Calculations

(202)-418-2700

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### Results -- FM and TV Propagation Curves Calculations

Entered HAAT is less than 30 meters -- Set to 30 m

Free Space equation used, not curves

### Results of Calculation

**Distance to Contour = 0.362 km**

[Back to Numeric Entries](#) [Back to Initial Selections](#)

### For input data from Pages 1 and 2:

ERP entered = 0.150 kW  
HAAT entered = -33.00 meters  
Field Strength entered = 107.500 dBu  
Find the Distance to the Contour, Given a Field Strength  
F(50,10) curves for interfering contours  
FM and NTSC analog TV Channels 2 through 6

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Comments on this program may be referred to [Dale Bickel](#)

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Please send comments via standard mail to the Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, S.W., Washington, D.C., 20554. Questions can also be answered by calling the FCC's National Call Center, toll free, at 1-888-Call FCC (1-888-225-5322).

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Federal Communications

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**RF Worksheet #1 – FM (including translators & boosters)**

**PLEASE COPY BEFORE USING. THE DETERMINATION OF COMPLIANCE MAY INVOLVE REPEATED CALCULATIONS. IF LOCATED ON A MULTIPLE FM USER TOWER, PLEASE COMPLETE RF WORKSHEET 1A BEFORE PROCEEDING.**

**EFFECTIVE RADIATION CENTER HEIGHT**

Enter proposed "height of radiation center above ground" OR as listed in Line 1 7 m (1)  
of Worksheet 1A.

Is antenna supporting structure located on the roof of a building? (check one)

☐ Yes ☒ No (2)

If Line 2 is "Yes" enter the building height measured at the base of the antenna supporting structure in Line 3

If Line 2 is "No" enter "0" in Line 3..... 0 m (3)

Subtract Line (3) from Line (1)..... 7 m (4)

Subtract the value 2.0 from Line (4)..... 5 m (5)

**TOTAL EFFECTIVE RADIATED POWER**

(If "beam tilt" is utilized, list maximum values)

List Effective Radiated Power in the Horizontal Plane..... .150 kW (6)

List Effective Radiated Power in the Vertical Plane..... .150 kW (7)

Add Lines (6) and (7) OR list value from Line 2 in Worksheet 1A..... .300 kW (8)

**PERCENTAGE OF FCC RF LIMIT(S) FOR MAXIMUM PERMISSIBLE EXPOSURE**

Multiply Line (8) by 33.41 ..... 10.02 (9)

Multiply the value listed in Line (5) by itself..... 100.40 (10)

Divide Line (9) by Line (10) ..... .09 (11)

Multiply Line (11) by (100) ..... 9.0 (12)

**DETERMINATION OF COMPLIANCE WITH CONTROLLED/OCCUPATIONAL LIMIT**

Does Line (12) exceed 100%..... ☐ Yes ☒ No (13)

**IF YOU ANSWERED "YES" IN LINE (13), THE WORKSHEETS MAY NOT BE USED IN THIS CASE.\***

**IF YOU ANSWERED "NO" IN LINE (13), THEN THE SITE SHOULD COMPLY WITH THE FCC'S CONTROLLED/OCCUPATIONAL RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE**

\*In this case, you may need to prepare an Environmental Assessment. See Instructions for Section III-C FCC Form 301.

**DETERMINATION OF COMPLIANCE WITH THE UNCONTROLLED/GENERAL POPULATION LIMIT**

Does Line (12) exceed 20%..... ☐ Yes ☒ No (14)