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WNCX(FM) FCC 301 Application
Section III-B Engineering, Item 17
Environmental and Shared Use
Discussion
CBS Radio of Cleveland Inc.
July 18, 2008

CBS Radio of Cleveland Inc. (CBS), the licensee of WNCX(FM) Fac ID 41390, Cleveland, OH., seeks to operate using a shared / combined auxiliary antenna. CBS proposes to use an ERI model SHPX-4AC-HW-SP, half-wave spaced antenna, recently installed by WQAL(FM) as a direct replacement for its licensed auxiliary antenna located at coordinates 41° 22' 45" North Latitude, 81° 43' 12" West Longitude (NAD27) and at a center of radiation 111 meters above ground level. This proposal complies with FCC §73.1675(a)(1). WQAL has a pending FCC 302 application on file (BMXLH-20080602AHG) to modify its auxiliary license to operate with the new antenna at 8.5 kW ERP.

WNCX proposes to also operate with an ERP of 8.5 kW H & V. In addition, an application is also being filed for combined use of the same antenna by CBS owned WDOK(FM) which will also propose operating at 8.5 kW.

An analysis has been made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition 97-01, prepared by the FCC Office of Engineering and Technology. This analysis was made using a series of reference points two meters above ground level in the area surrounding the base of the antenna supporting structure.

Calculations were made with the assumption that all 3 transmitters would be in operation at the same time. The results indicate that the proposed auxiliary antenna operation will contribute, in a worst case operating configuration, less than 2% of the MPE for General Population at any point on the ground. Individually, each contributor would cause far less than the 5% trigger level for further study. Accordingly, the proposed facility is categorically excluded by FCC Rules from having to consider the contributions of other stations at the site.

If work is done on the tower or in any other area where over exposure could occur, CBS, in coordination with the other users will take necessary action to prevent the overexposure of workers on the tower including reducing the WNCX and/or other transmitting power(s) or ceasing operation completely.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The WNCX auxiliary antenna facility will utilize an existing supporting structure that is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest.
2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since no change in the existing lighting is proposed.
3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.