

**Compliance with Special Operating Conditions**

The Construction Permit contains several Special Operating Conditions, summarized as follows:

1. The permittee/licensee, in coordination with other site users, must reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.
  2. Waiver of 47 C.F.R. 73.1125 was granted to allow operation of KLRI as a satellite operation of KLVR(FM), Santa Rosa, CA (FIN 18801).
  3. The permittee has specified an 8-bay 0.9λ ERI Rototiller; any other type or size of antenna will require a formal request for Program Test Authority.
- EMF agrees to fully cooperate with other site users to reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.
  - Condition two has been met. See Exhibit 6 for details.
  - EMF has chosen to use a 12-bay 0.5λ ERI P-300 instead of the originally specified antenna. As can be seen in the attached analysis, the constructed facility produces a maximum of 8.04 uW/cm<sup>2</sup>, which is 4.0% of the uncontrolled (public) limits of OET-65, which is less than the maximum value specified in EMFs application. Further, this value falls below the 5% “threshold of responsibility” specified in 47 C.F.R. 1.1307(b) and 1.1307(b)(3). Therefore, EMF respectfully requests that Program Test Authority be reinstated.

Therefore, all Special Operating Conditions of the KLRI-FM Construction Permit (FCC File Number BMPED-20040809ABN) have been met.

KLRI Rigby ID  
RF Analysis  
ERI P-300 12HW  
12-bay 1/2 wavelength-spaced  
EPA model: Dipole/Ring Stub  
Maximum values shown in bold-face type

Distance (meters)	PD (horiz)	PD (vert)	Total (uW/cm2)	% of 200 uW/cm2
0	0.0000	0.0000	0.0000	0.00%
1	0.0000	0.0001	0.0001	0.00%
2	0.0000	0.0022	0.0022	0.00%
3	0.0000	0.0114	0.0114	0.01%
4	0.0000	0.0362	0.0362	0.02%
5	0.0000	0.0903	0.0903	0.05%
6	0.0000	0.1907	0.1907	0.10%
7	0.0000	0.3577	0.3577	0.18%
8	0.0000	0.6140	0.6140	0.31%
9	0.0000	0.9621	0.9621	0.48%
10	0.0000	1.4195	1.4195	0.71%
11	0.0000	1.9940	1.9940	1.00%
12	0.0000	2.6824	2.6824	1.34%
13	0.0000	3.4638	3.4638	1.73%
14	0.0000	4.3093	4.3093	2.15%
15	0.0000	5.1789	5.1789	2.59%
16	0.0000	6.0186	6.0186	3.01%
17	0.0000	6.7803	6.7803	3.39%
18	0.0000	7.4310	7.4310	3.72%
19	0.0000	7.8688	7.8688	3.93%
20	0.0000	<b>8.0382</b>	<b>8.0382</b>	<b>4.02%</b>
21	0.0000	7.9026	7.9026	3.95%
22	0.0000	7.3986	7.3986	3.70%
23	0.0000	6.5725	6.5725	3.29%
24	0.0000	5.5307	5.5307	2.77%
25	0.0000	4.3574	4.3574	2.18%
26	0.0000	3.1540	3.1540	1.58%
27	0.0000	2.0370	2.0370	1.02%
28	0.0000	1.0976	1.0976	0.55%
29	0.0000	0.4116	0.4116	0.21%
30	0.0000	0.0481	0.0481	0.02%
31	0.0000	0.0433	0.0433	0.02%
32	0.0000	0.3963	0.3963	0.20%
33	0.0000	1.0582	1.0582	0.53%
34	0.0000	1.9457	1.9457	0.97%
35	0.0000	2.9593	2.9593	1.48%
36	0.0000	3.9904	3.9904	2.00%
37	0.0000	4.9334	4.9334	2.47%
38	0.0000	5.6973	5.6973	2.85%
39	0.0000	6.2130	6.2130	3.11%
40	0.0000	6.4393	6.4393	3.22%
41	0.0000	6.3655	6.3655	3.18%
42	0.0000	6.0091	6.0091	3.00%
43	0.0000	5.4127	5.4127	2.71%
44	0.0000	4.6373	4.6373	2.32%
45	0.0000	3.7558	3.7558	1.88%
46	0.0000	2.8449	2.8449	1.42%
47	0.0000	1.9623	1.9623	0.98%
48	0.0000	1.2005	1.2005	0.60%
49	0.0000	0.6061	0.6061	0.30%
50	0.0000	0.2083	0.2083	0.10%

Distance (meters)	PD (horiz)	PD (vert)	Total (uW/cm2)	% of 200 uW/cm2
51	0.0000	0.0184	0.0184	0.01%
52	0.0000	0.0314	0.0314	0.02%
53	0.0000	0.2279	0.2279	0.11%
54	0.0000	0.5773	0.5773	0.29%
55	0.0000	1.0472	1.0472	0.52%
56	0.0000	1.6348	1.6348	0.82%
57	0.0000	2.2871	2.2871	1.14%
58	0.0000	2.9631	2.9631	1.48%
59	0.0000	3.6219	3.6219	1.81%
60	0.0000	4.2256	4.2256	2.11%
61	0.0000	4.7417	4.7417	2.37%
62	0.0000	5.1444	5.1444	2.57%
63	0.0000	5.4158	5.4158	2.71%
64	0.0000	5.5459	5.5459	2.77%
65	0.0000	5.5333	5.5333	2.77%
66	0.0000	5.3596	5.3596	2.68%
67	0.0000	5.0141	5.0141	2.51%
68	0.0000	4.5755	4.5755	2.29%
69	0.0000	4.0683	4.0683	2.03%
70	0.0000	3.5178	3.5178	1.76%
71	0.0000	2.9492	2.9492	1.47%
72	0.0000	2.3863	2.3863	1.19%
73	0.0000	1.8509	1.8509	0.93%
74	0.0000	1.3616	1.3616	0.68%
75	0.0000	0.9339	0.9339	0.47%
76	0.0000	0.5794	0.5794	0.29%
77	0.0000	0.3063	0.3063	0.15%
78	0.0000	0.1191	0.1191	0.06%
79	0.0000	0.0191	0.0191	0.01%
80	0.0000	0.0044	0.0044	0.00%
81	0.0000	0.0704	0.0704	0.04%
82	0.0000	0.2103	0.2103	0.11%
83	0.0000	0.4154	0.4154	0.21%
84	0.0000	0.6759	0.6759	0.34%
85	0.0000	0.9812	0.9812	0.49%
86	0.0000	1.3202	1.3202	0.66%
87	0.0000	1.6822	1.6822	0.84%
88	0.0000	2.0563	2.0563	1.03%
89	0.0000	2.4326	2.4326	1.22%
90	0.0000	2.8017	2.8017	1.40%
91	0.0000	3.1553	3.1553	1.58%
92	0.0000	3.4860	3.4860	1.74%
93	0.0000	3.7877	3.7877	1.89%
94	0.0000	4.0554	4.0554	2.03%
95	0.0000	4.2851	4.2851	2.14%
96	0.0000	4.4740	4.4740	2.24%
97	0.0000	4.6205	4.6205	2.31%
98	0.0000	4.7239	4.7239	2.36%
99	0.0000	4.7809	4.7809	2.39%
100	0.0000	4.7901	4.7901	2.40%