

Exhibit 43 - Statement C  
**ENVIRONMENTAL CONDITIONS**  
prepared for  
**Lincoln Broadcasting Company**  
KTSF-DT (AUX) San Francisco, California  
DTV Ch. 27 220 kW 400 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

*Lincoln Broadcasting Company* proposes to employ the side mounted antenna presently authorized in a Special Temporary Authorization (BSTADT-20010710ABQ) as an auxiliary DTV facility antenna. The antenna is currently mounted on an existing tower located at the developed communications site atop Mt. San Bruno, near San Francisco, having the Antenna Structure Registration number 1205149. No change in the overall height of the structure is proposed as a result of this proposal.

Based on information provided by the applicant, it is believed that the provisions of Section 1.1307(a)(1-7) would not apply in this case. Further, the use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of Section 1.1306 of the Commission's Rules. Since no change in the overall height of the structure is proposed, no change in the current structure marking and lighting requirements is anticipated. Therefore, it is believed that this request may be categorically excluded from environmental processing pursuant to Section 1.1306 of the Commission's Rules.

### **Human Exposure to Radiofrequency Radiation**

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65

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("OET-65"). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency guidelines adopted in Section 1.1310 of the Commission's Rules. Under present Commission policy, a facility may be presumed to comply with the limits specified in Section 1.1310 if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The proposed transmitting antenna system's center of radiation will be located 68 meters above ground level. An ERP of 220 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer (see **Exhibit 40 - Figure 2** and **Exhibit 40 - Attachment 1**), the antenna has a relative field of 28.4% or less from 25 to 90 degrees below the horizontal plane (i.e.: below the antenna) on Channel 27. Thus, a value of 28.4% relative field is used for this calculation. The "controlled / occupational" population limit specified in Section 1.1310 for Channel 27 (center frequency 551 MHz) is 1,836.7  $\mu\text{W}/\text{cm}^2$ .

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = ((33.4098) \times (F^2) \times (ERP))/D^2$$

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Where:

S	=	power density in microwatts/cm <sup>2</sup>
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Using this formula, the proposed facility would contribute a maximum power density of 136.1  $\mu\text{W}/\text{cm}^2$  at two meters above ground level at a location 2 meters above ground level about the base of the supporting structure or 7.4% of controlled/occupation limit.

Because the preceding evaluation does not take into account terrain features at the site, a detailed review of the terrain features surrounding the proposed site was also performed. As indicated on the "San Francisco - South" U.S.G.S. Quadrangle map, the terrain slopes away from the proposed site except in the direction towards 270° True, where the terrain rises slightly. Using the manufacturer provided elevation pattern data shown in **Exhibit 40 - Figure 2**, the highest level of exposure might be expected to occur 28 to 36 meters from the proposed site. However, when the terrain features are considered together with the antenna's horizontal plane azimuth pattern, the RF exposure falls below 5% of the controlled/occupational limit. Further, where the terrain rises, the distance is such that the predicted RF exposure is below 5% of the controlled/occupational limit. Thus, detailed calculations show that the proposal's contribution to RF density is less than 5% of the controlled/occupational limit at all locations 2 meters above ground.

**Safety of the General Public**

The communication site atop Mt. San Bruno is a controlled access site. Based on information provided by a management-level representative of the

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applicant, access to the area surrounding the tower is limited by a fence which will encompass the tower itself, an adjacent tower, and the adjacent building. The fence prevents access to the site from the publically accessible nearby roadway. Nevertheless, tower access will remain restricted and controlled through the use of a locked fence. Appropriate RF exposure warning signs will continue to be posted. Only authorized and trained personnel are permitted within the fenced area. Further, steep terrain surrounding the site serves to discourage and restrict casual access to some locations outside the fenced compound. For these reasons, the applicant considers the fenced area and adjacent steep terrain to be restricted, and the "controlled / occupational" exposure limits to RF electromagnetic fields would apply in these locations.

Within 70 meters of the base of the tower structure, some locations (two meters above ground level) will be subject to higher levels of RF density attributable to the proposed facility (in excess of five percent of the "general population / uncontrolled" MPE limit). Locations exceeding five percent of the "general population / uncontrolled" limit are considered by the applicant to be "controlled", as access to these areas is restricted (as described above). Calculated RF exposure levels along the publically accessible roadway are below the five percent "general population / uncontrolled" limit when the proposed antenna's horizontal plane pattern is considered.

Section 1.1307(b)(3) of the FCC Rules states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the area where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level

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areas, the impact of other facilities near the site may be considered independently from the proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined in Section 1.1307(b) of the FCC Rules.

**Safety of Tower Workers**

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in the areas at ground level. A site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on the tower (or on nearby towers) in areas where high RF levels may be present. Such protective measures may include, but if necessary will not be limited to, power reduction, or the complete shutdown of facilities when work or inspections must be performed in an area where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations, including with respect to advance notification of worker presence to all users of the tower and adjacent areas of the site.

**Conclusion**

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing and is deemed to have no significant effect on the quality of the human environment under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.