

EXHIBIT 9  
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NONIONIZING RADIATION COMPLIANCE

Journal Broadcast Corporation  
Twin Falls, ID

The proposed modified KSAW-LP facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. This facility will operate with a maximum peak visual effective radiated power of 21.6 kilowatts and a maximum aural effective radiated power of 2.16 kilowatts using a Jampro JUHD-5/3(15) directional antenna with its center of radiation located 33.5 meters above ground level on an existing 55.5 meter tower. This tower presently supports the antennas for KIPT(TV) - Twin Falls, Idaho and its paired DTV station KIPT-DT. There are numerous other broadcast facilities located within 315 meters of the tower that will support this antenna.

Table 9.0 and Figure 9.0 present the vertical radiation pattern for the proposed antenna, which was supplied by the manufacturer. Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels at the base of a TV broadcast tower. Using this vertical radiation pattern in conjunction with this equation yields a predicted worst case maximum power density of  $2.59 \mu\text{W}/\text{cm}^2$  at two meters above ground level, which will occur at a depression angle of  $76^\circ$  below horizontal and at a horizontal distance of 7.9 meters from the base of this tower. Since the permitted power density for uncontrolled exposure on Channel 51 is  $461.33 \mu\text{W}/\text{cm}^2$ , this amounts to only 0.56% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed modified KSAW-LP facilities are excluded from environmental processing

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under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating compliance with this standard.

KSAW-LP, in conjunction with these other co-located and nearby stations, will also take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, by one or more of these stations, when work becomes necessary in areas on this tower where the total power density levels are in excess of the permitted level for controlled exposure.

TABLE 9.0

**KSAW-LP VERTICAL RADIATION PATTERN**

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Twin Falls, ID



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**Elevation Pattern Tabulation**

## ELEVATION PATTERN TABULATION

## RELATIVE FIELD VS ELEVATION ANGLE

| <u>ELEVATION<br/>ANGLE</u> | <u>RELATIVE<br/>FIELD</u> | <u>ELEVATION<br/>ANGLE</u> | <u>RELATIVE<br/>FIELD</u> | <u>ELEVATION<br/>ANGLE</u> | <u>RELATIVE<br/>FIELD</u> |
|----------------------------|---------------------------|----------------------------|---------------------------|----------------------------|---------------------------|
| 10                         | 0.146                     | -26                        | 0.114                     | -61                        | 0.030                     |
| 9                          | 0.212                     | -27                        | 0.132                     | -62                        | 0.021                     |
| 8                          | 0.229                     | -28                        | 0.129                     | -63                        | 0.012                     |
| 7                          | 0.174                     | -29                        | 0.106                     | -64                        | 0.002                     |
| 6                          | 0.045                     | -30                        | 0.070                     | -65                        | 0.010                     |
| 5                          | 0.148                     | -31                        | 0.077                     | -66                        | 0.021                     |
| 4                          | 0.376                     | -32                        | 0.069                     | -67                        | 0.033                     |
| 3                          | 0.611                     | -33                        | 0.064                     | -68                        | 0.044                     |
| 2                          | 0.810                     | -34                        | 0.047                     | -69                        | 0.052                     |
| 1                          | 0.953                     | -35                        | 0.033                     | -70                        | 0.062                     |
| 0                          | 1.000                     | -36                        | 0.016                     | -71                        | 0.071                     |
| -1                         | 0.953                     | -37                        | 0.002                     | -72                        | 0.073                     |
| -2                         | 0.810                     | -38                        | 0.017                     | -73                        | 0.080                     |
| -3                         | 0.611                     | -39                        | 0.026                     | -74                        | 0.078                     |
| -4                         | 0.376                     | -40                        | 0.032                     | -75                        | 0.083                     |
| -5                         | 0.148                     | -41                        | 0.031                     | -76                        | 0.087                     |
| -6                         | 0.045                     | -42                        | 0.026                     | -77                        | 0.081                     |
| -7                         | 0.174                     | -43                        | 0.016                     | -78                        | 0.083                     |
| -8                         | 0.229                     | -44                        | 0.005                     | -79                        | 0.076                     |
| -9                         | 0.212                     | -45                        | 0.006                     | -80                        | 0.077                     |
| -10                        | 0.146                     | -46                        | 0.017                     | -81                        | 0.078                     |
| -11                        | 0.051                     | -47                        | 0.025                     | -82                        | 0.069                     |
| -12                        | 0.041                     | -48                        | 0.029                     | -83                        | 0.069                     |
| -13                        | 0.109                     | -49                        | 0.032                     | -84                        | 0.070                     |
| -14                        | 0.140                     | -50                        | 0.028                     | -85                        | 0.060                     |
| -15                        | 0.131                     | -51                        | 0.021                     | -86                        | 0.060                     |
| -16                        | 0.090                     | -52                        | 0.012                     | -87                        | 0.060                     |
| -17                        | 0.030                     | -53                        | 0.001                     | -88                        | 0.060                     |
| -18                        | 0.034                     | -54                        | 0.010                     | -89                        | 0.050                     |
| -19                        | 0.084                     | -55                        | 0.020                     | -90                        | 0.050                     |
| -20                        | 0.111                     | -56                        | 0.027                     |                            |                           |
| -21                        | 0.109                     | -57                        | 0.033                     |                            |                           |
| -22                        | 0.081                     | -58                        | 0.037                     |                            |                           |
| -23                        | 0.033                     | -59                        | 0.037                     |                            |                           |
| -24                        | 0.024                     | -60                        | 0.035                     |                            |                           |
| -25                        | 0.078                     |                            |                           |                            |                           |

Customer: Journal Broadcast Group  
Channel: 51

Model: JUHD-5/3 (15)  
Description: UHF Panel Antenna  
-0 ° Beam Tilt, 0% Null Fill

FIG. 9.0

KSAW-LP VERTICAL RADIATION PATTERN

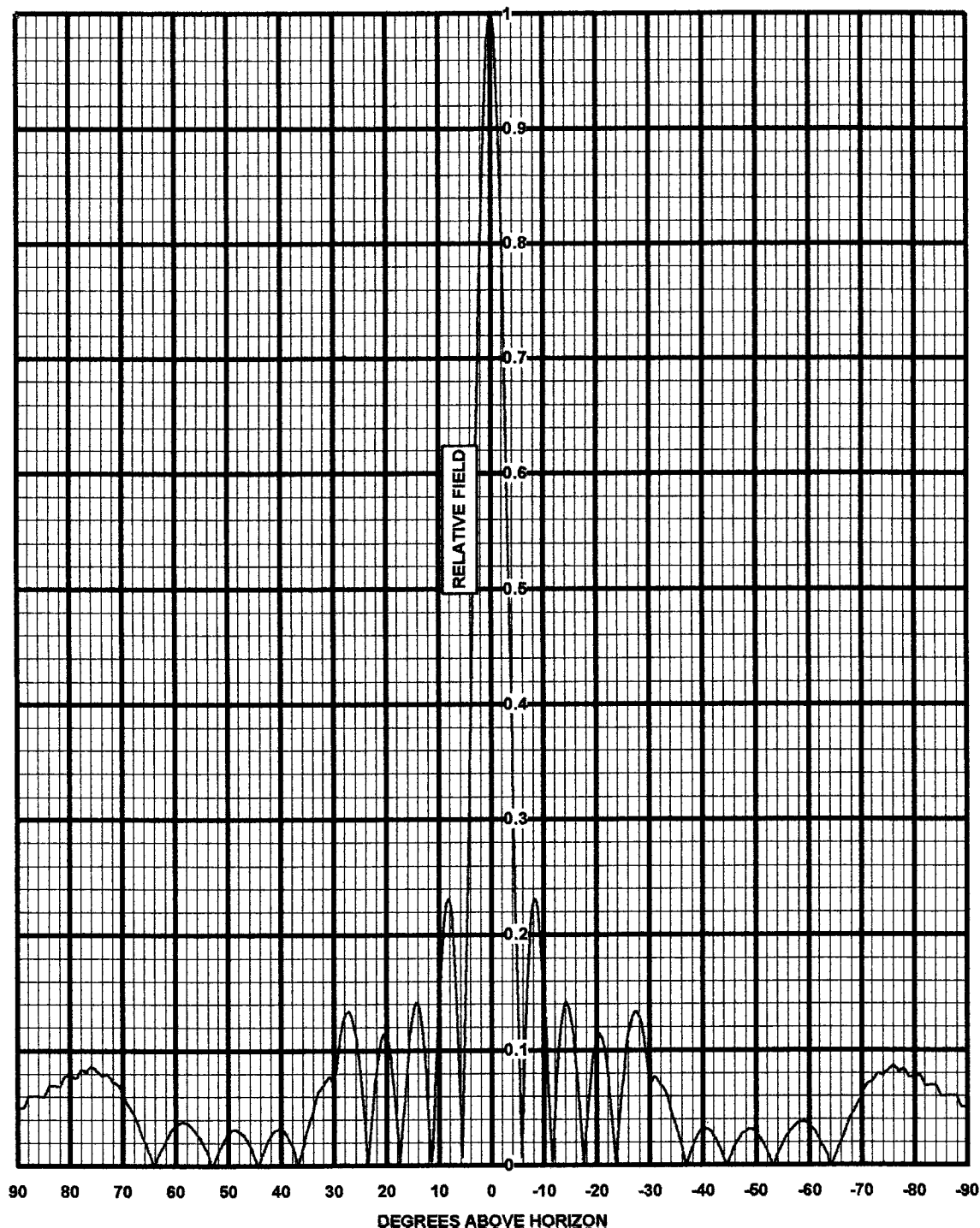
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COMPUTED ELEVATION PATTERN



Customer: Journal Broadcast Group  
Channel: 51

Model: JUHD-5/3 (15)  
Description: UHF Panel Antenna  
-0 ° Beam Tilt, 0% Null Fill