

Environmental Protection

There are two main factors that need to be addressed in order to make sure that the environment around a proposed facility is protected.

1) Significant affects to the environment.

EMF's proposed facility will be constructed on an existing tower in an established "antenna farm". The site proposed herein has both registered (6 registered towers within 200 meters) and unregistered towers on the site. According to 47 C.F.R. Section 1.1306 Note 3, such facilities "will be categorically excluded" from environmental processing except for the RF requirements of Section 1.1307(b).

2) Human exposure to excess levels of radiofrequency radiation.

In order to comply with OET 65, EMF carefully investigated RF sources on the site, and learned that the site is not straightforward. There are multiple towers and multiple radiators on each tower. The proposed modification to KQLR is to be built on a tower that, according to FCC records is within 200 meters of a numerous broadcast facilities and applications:

Because of this large number of facilities and the complexities of calculations with multiple radiators on multiple towers, EMF believes that theoretical calculations would give inaccurate results at best.

Accordingly, EMF respectfully requests that the Commission grant the instant Construction Permit with the condition that EMF make RF measurements before constructing the facility and submit the results of those measurements, along with the theoretical change caused by the addition of its antenna, prior to Commission grant of Program Test Authority.

If the results of the measurements and subsequent calculations reveal that there are areas that would exceed the requirements of OET 65 for controlled or uncontrolled access, EMF will work with the site owners and other broadcasters to erect fencing and/or signage to fully comply with OET 65.

Further, after construction of the instant facility, EMF will continue to cooperate with other site users to reduce power or cease broadcasting as necessary to protect workers and others having access to the site from excessive levels of RF Radiation.