

**MINOR CHANGE APPLICATION**  
**CUMULUS LICENSING LLC**  
**KZEL-FM RADIO STATION**  
**CH 241C - 96.1 MHZ - 100.0 KW**  
**EUGENE, OREGON**  
**January 2009**

**EXHIBIT B**

**Radio Frequency Assessment**

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. §1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997 ("Bulletin"), regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. It is noted that KZEL-FM's proposed tower site is located in a de factor tower farm. This study and utilizes the appropriate formulas contained in the OET Bulletin.<sup>1</sup>

The KZEL-FM proposed antenna system will be mounted with its center of radiation 256.1 meters (840.2) above the ground at the proposed tower location. The KZEL-FM antenna will operate with an effective radiated power of 100.0 kilowatts in the horizontal and vertical planes (circularly polarized). KZEL-FM will operate with an Electronics Research, Inc., rototiller style five bay full wavelength antenna system (FCC/EPA Type 3). At 2.0 meters above the ground at the base of the tower, the height of an average person, the KZEL-FM antenna system will contribute 0.0078 mw/cm<sup>2</sup>.<sup>2</sup> Based on exposure limitations for a controlled

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- 1) The contributions of the FM facilities were calculated using the FMModel program. A single bay EPA dipole antenna was used for calculation purposes. In cases where the number of bays of the antenna was known, this data was used in the FMModel program.
  - 2) This level of field occurs at 90 meters out from the base of the tower and is considered worst case.

environment, 0.8% of the allowable limit is reached at 2.0 meters above the ground at the base of the tower. For uncontrolled environments, 3.9% of the ANSI limit is reached at 2.0 meters above the ground at the base of the tower.

Since this level for controlled and uncontrolled environments is less than the 5% limit defined by the Commission in §1.1307(b)(3)(i), the proposed KZEL-FM antenna system facility is believed to be in compliance with the radio frequency radiation exposure limits, as required by the Federal Communications Commission. Further, Cumulus will post warning signs in the vicinity of the tower warning of potential radio frequency radiation hazards at the site. In addition, Cumulus will reduce the power of the facility or cease operation, in cooperation and coordination with other tower users, as necessary, to protect persons having access to the site, tower or antenna from radio frequency radiation in excess of FCC guidelines