

Environmental Protection

EMF's proposed facility will be constructed on an existing tower (tower ID 1047894) and will cause no adverse effects to the surrounding environment at the site.

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 KARQ is to be built on a tower that, according to FCC records is within 200 meters of a number of 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.