

Exhibit B-17 NIER Analysis

Facilities Proposed

The proposed operation will have an effective radiated power of 100 kilowatts. Operation is proposed with an 10-element circularly-polarized omni-directional three-quarter-wave-spaced ERI cogwheel antenna. The antenna will be mounted on one arm of a “candelabra” tower. This will be a combined antenna system shared by a number of FM broadcast stations.

Notice of the proposed tower construction has been filed with the Federal Aviation Administration on FAA Form 7460-1. Upon receipt of the FAA's determination of no hazard, FCC Antenna Structure Registration for the tower will be filed on FCC Form 854, and the resulting Antenna Structure Registration Number will be promptly supplied to the Audio Services Division.

NIER Calculations

OET Bulletin 65 Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (Edition 97-01) states in part that:

When performing an evaluation for compliance with the FCC's RF guidelines all significant contributors to the ambient RF environment should be considered. . .For purposes of such consideration, significance can be taken to mean any transmitter producing more than 5% of the applicable exposure limit (in terms of power density or the square of the electric or magnetic field strength) at accessible locations.

As will be demonstrated below, the proposed operation will produce less than 5% of the applicable exposure limit for both controlled and uncontrolled environments. Thus, the proposed facility is categorically excluded from the requirement of further study. Therefore, pursuant to §1.1307(b)(3) of the Commission's Rules no calculations are

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required for the other FM and TV facilities in the vicinity, and precise calculations are made only with regard to the levels from this proposal.

The power density calculations shown below were made using the techniques outlined in the EPA report titled: *An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM, and TV Broadcast Services* (Gailey & Tell, April, 1985). All calculations contained herein are based on the measured element patterns for the antenna, and follow the procedure shown in the Gailey and Tell report. The patterns were identified by applying the procedure outlined in the report to the measurement data contained in the report titled: *Element Pattern Measurements on FM Antennas* (EPA-520/ 6-85-107, June 1985).

"Ground level" calculations in this report have been made at a reference height of 2 meters above ground to provide a worst-case estimate of exposure for persons standing on the ground in the vicinity of the tower. Equation #1, contained in the Gailey & Tell report and shown below, was used to calculate the ground level power density figures from each FM antenna at incremental distances from the base of its supporting tower.

$$S(\text{mW} / \text{cm}^2) = \frac{33.40981 \times \text{AdjERP}(\text{Watts})}{D^2}$$

Where: *AdjERP(Watts)* is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

D is the distance in meters from the center of radiation to the calculation point.

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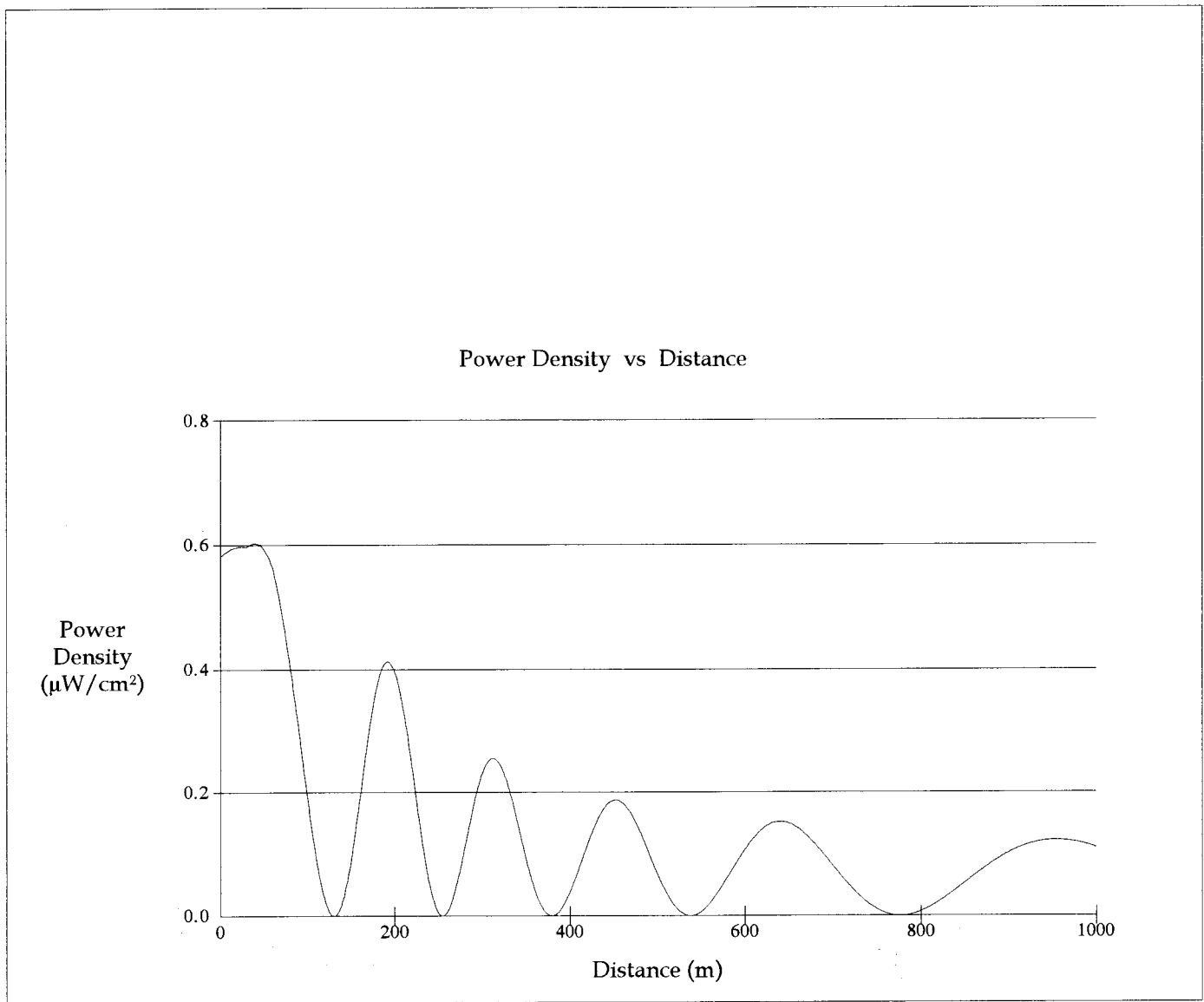
Calculations of the power density produced by the proposed antenna system assume a Type 1 element pattern, which is the appropriate element pattern for a “worst case” ring-stub type antenna. (There is no applicable element pattern for the ERI cogwheel antenna which will be used by this facility.) Ground level power densities have been calculated for locations extending from the base of the tower to a distance of 1000 meters. Values past this point are increasingly negligible.

The highest calculated ground level power density from the proposed facility occurs at a distance of 39 meters from the base of the antenna support structure. At this point the power density is calculated to be 0.6 FW/cm², less than 1% of 1000 FW/cm² (the FCC standard for controlled environments) and less than 1% of 200 FW/cm² (the FCC standard for uncontrolled environments).

These calculations show that the maximum calculated power density produced at two meters above ground level by the proposed facility alone is less than 5% of the applicable FCC exposure limit at all locations between 1 and 1000 meters from the base of the antenna support structure. Section 1.1307(b)(3) of the Commission's Rules excludes applications for new facilities or modifications to existing facilities from the requirement of preparing an environmental assessment when the calculated emissions from the applicants proposed facility are predicted to be less than 5% of the applicable FCC exposure limit. Therefore, the proposed facility is in compliance with Section 1.1301 et seq and no further analysis of non-ionizing radiation at this site is required in this application.

Public access to the site is restricted by a locked gate and the antenna tower is posted with warning signs. Pursuant to OST Bulletin No. 65, all station personnel and contractors are required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.

The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency radiation in excess of FCC guidelines.



Ground-Level NIER Analysis

OET FMModel

FM on new "Richland Tower"

Antenna Type: "worst case" ring-stub type assumed (for ERI cogwheel)

Number of Elements: 10

Element Spacing: 0.75 wavelength

Distance: 1000 meters

Horizontal ERP: 100.0 kW

Vertical ERP: 100.0 kW

Antenna Height: 341 meters AGL

Maximum Power Density is 0.6 $\mu\text{W}/\text{cm}^2$ at 39 meters from the antenna structure.

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