

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Radio Vermont Classics, L.L.C, to conduct radiofrequency (“RF”) exposure measurements at the Mt. Mansfield broadcast site for compliance with appropriate guidelines limiting human exposure to radio frequency (“RF”) electromagnetic fields.

Prevailing Exposure Standards

The U.S. Congress requires that the Federal Communications Commission (“FCC”) evaluate its actions for possible significant impact on the environment. In Docket 93-62, effective October 15, 1997, the FCC adopted the human exposure limits for field strength and power density recommended in Report No. 86, “Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,” published in 1986 by the Congressionally chartered National Council on Radiation Protection and Measurements (“NCRP”). Separate limits apply for occupational and public exposure conditions, with the latter limits generally five times more restrictive. The more recent standard, developed by the Institute of Electrical and Electronics Engineers and approved as American National Standard ANSI/IEEE C95.1-2006, “Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz,” includes similar exposure limits. A summary of the FCC’s exposure limits is shown in Figure 1. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Restrictions on access to strong fields may be achieved in different manners for casual public exposure than for occupational exposure. Persons who are authorized to be in a site area can be educated to follow procedures that will limit time-averaged exposures to levels not exceeding the guidelines. Occupational exposures can be averaged over a six-minute period, allowing, for example, a two-minute exposure to fields three times the limit if the remainder of the six-minute period does not include any significant exposure.

Background

FM Station WCVT, 101.7 MHz, Stowe, Vermont, had installed an ERI LP-2E-DA-HW, two-bay, half-wave-spaced, directional antenna, at an effective height of about 19 meters above ground on the Vermont Educational Tower, designated TV-TWR-1989, at the Mt. Mansfield broadcast site, and operates with a maximum effective radiated power of 997 watts.

The Mt. Mansfield site has three other towers housing five DTV stations and two other FM stations near the summit. In addition to the full-service broadcast operations, it is reported that approximately



FM Station WCVT • Channel 269C2, 101.7 MHz • Stowe, Vermont

80 non-broadcast transmitting facilities (mostly two-way radio transmitter of various types) operate from the site.

The access road to the Mt. Mansfield summit is reported to be open between mid-May and mid-October, annually, weather permitting, and there are several trails throughout the mountain top.

Measurements at Mt. Mansfield

Measurements throughout the Nose area of Mt. Mansfield were made by the undersigned engineer on October 25, 2011. The measurement equipment used was a Wandel & Goltermann Type EMR-300 Radiation Meter (Serial No. AG-0058) with a Type 25 Isotropic Electric Field Probe (Serial No. E-0001), and a Narda Type SRM-3000 Selective Radiation Meter (Serial No. F-0031) with a Type BN-3501 Isotropic Broadband Electric Field Probe (Serial No. F-0041). All meters and probes were under current calibration by manufacturer.

The Type 25 probe is frequency-shaped to reflect the occupational exposure limits detailed in the FCC standard, allowing the meter to measure correctly the total exposure levels from various emitters at the site. The meter conveniently reads directly in percent of the occupational limits of the standard; at the broadcast frequencies of interest, conversion to percent of the public limit was made by multiplying the indicated result by a factor of five. The SRM-3000 and associated probe allows the determination of the spectral composition of the RF fields, and can be used to determine the contribution of each source to the total RF exposure level.

Results of Measurements

The majority of the Nose area measured well below the FCC public limit. However, RF exposure levels in one area around the base of Tower K1A, were observed to consistently exceeded the FCC public limit on a spatially averaged basis. The maximum spatially averaged level measured within the identified area was 150% of the FCC public limit. The contribution of WCVT to that area was measured to be less than 5% of the applicable FCC limit, and so WCVT it is excluded under FCC Rules Section 1.1307(b)(1) Table 1 and 1.1307(b)(3) from having to bring the site into compliance.

No Recommended Mitigation Measures

Due to their mounting location on a tall tower, the WCVT antenna is not accessible to the general public, and so no mitigation measures are necessary to comply with the FCC public exposure guidelines. It is presumed that Vermont Educational Tower already takes adequate precautions to ensure that there is no unauthorized access to its tower. To prevent exposures in excess of the occupational limit by authorized Vermont Educational Tower workers, it is expected that they will adhere to appropriate safety protocols adopted by that company.



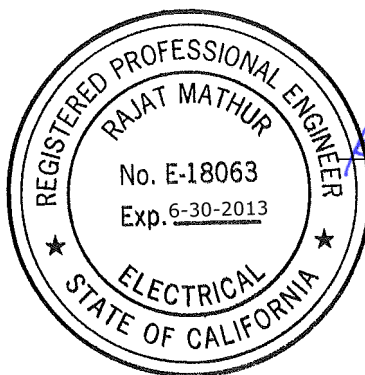
Conclusion

Based on the information and analysis above, it is the undersigned's professional opinion that operation of WCVT at Mt. Mansfield, complies with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the environment. The highest calculated level in publicly accessible areas due to WCVT is much less than the prevailing standards allow for exposures of unlimited duration.

Authorship

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration No. E-18063, which expires on June 30, 2013. This work has been carried out under his direction, and all statements are true and correct of his own knowledge except, where noted, when data has been supplied by others, which data he believes to be correct

November 11, 2011



Rajat Mathur
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