

## **Exhibit 44**

### **KHRR-DT Ch. 42**

### **Tucson, AZ**

## **Environmental Protection Act**

The location for the proposed temporary facilities for KHRR-DT is a pre-existing communications site on Tucson Mountain. No new tower construction is proposed. The antenna will be mounted below the top of the tower with its center of radiation at 39.7 meters (130 feet) above ground.

The proposed facilities will not expose the general public to levels of RF radiation exceeding the guidelines in 47 C.F.R. Section 1.1310 when analyzed using the equations in FCC OET Bulletin 65.

The maximum proposed KHRR-DT RF power density on ground to 8 meters (26 feet) above ground (to allow for roof-top exposure) at any location around the tower does not exceed 5% of the limit for general population/uncontrolled exposure ( $0.43 \text{ mW/cm}^2$  at 641 MHz) and is less than 1% of the limit for occupational/controlled exposure ( $2.14 \text{ mW/cm}^2$  at 641 MHz). The maximum calculated power density occurs approximately 15.4 meters (50 feet) from the base of the tower and, at  $0.018 \text{ mW/cm}^2$ , represents 0.84 percent of the occupational exposure level and 4.2 percent of the general public/uncontrolled exposure level. Access to the site is restricted with a locked gate and is not accessible to the public.

Exposure levels for workers above ground in the far field of the antenna were analyzed using Bulletin OET-65 equation 5, which assumes no ground reflections. This analysis shows workers will not be exposed to levels of RF radiation exceeding the limits for occupational/controlled exposure unless they are closer than 9 meters (29.5 feet) to the antenna. KHRR-DT will reduce power or suspend operations as necessary when tower work is being done within 29.5 feet of the antenna.

Near field on-tower exposure was analyzed using OET-65 Equation 20, the Tell Cylindrical Model. This analysis showed workers would not exceed the limits for occupational exposure at distances greater than 1.5 meters (5 feet) from the antenna. If workers on the KHRR-DT tower must pass closer than 5 feet from the antenna, KHRR-DT will reduce power or suspend operations as necessary to protect workers from excessive RF exposure in the near field.

Other high power broadcast operations, including the KHRR analog channel 40 facility, operate at Tucson Mountain. American Tower, the site manager, has posted signs warning of RF exposure around the site. KHRR agrees to work with other broadcasters at the site to obtain any power reductions necessary to protect its workers from RF exposure in excess of the guidelines in 47 C.F.R. Section 1.1310.

Doug Lung, June 22, 2006