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NONIONIZING RADIATION COMPLIANCE

Journal Broadcast Corporation
Sturgeon Bay, WI

The proposed digital facilities specified in the attached application will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. The proposed facilities will operate on Channel 22 with a maximum average effective radiated power of 4.3 kilowatts using a SWR SWLP8OI directional antenna that is side mounted at the 134.1 meter level on an existing 147.3 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels for a TV broadcast facility. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (4.3 kilowatts) for the expression $[0.4ERP_V + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Using this equation and assuming, as a worst case, 100% downward radiation yields a maximum predicted power density of 8.23 microwatts/cm² at two meters above ground level. Since the permitted power density for uncontrolled exposure on Channel 22 is 345.3 microwatts/cm², this amounts to only 2.38% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed facilities are excluded from environmental processing under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating uncontrolled exposure compliance with this standard.

WKTJ-CA, in conjunction with other co-located and nearby facilities, will also continue to take appropriate steps to insure that workers that must be on this tower will

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not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the power density levels are in excess of the permitted level for controlled exposure.