

Exhibit 8.2 – KVKR/KVAR Ground Level RF Power Density

Since a different type of antenna (PSI Model PSIFM-4C-DA four-bay double-V, EPA type 2) was used from that specified in the KVKR construction permit, a revised ground level RF field study is presented herein. The FCC's FM Model program was separately used to determine the predicted ground level power density resulting from this antenna as well as the colocated KVAR FM facilities. No other transmission facilities are located on or within a two mile radius of this tower. The KVAR antenna is a nondirectional three-bay PSI double-V design mounted at 56 meters AGL with an ERP of 12 kilowatts. Both antennas utilize one wavelength interbay spacing. Figures 8.2a and 8.2b depict the predicted ground level power density contribution of each antenna as a function of distance from the tower base, and figure 8.2c depicts the combined power density of both antennas. These graphs indicate that the worst-case combined RF power density of 85.9 microwatts per square centimeter occurs at a distance of 18.6 meters from the the base of the tower. This power density is less than half of the 200 microwatts per square centimeter limit established for uncontrolled environments.

To corroborate these FM model predictions, power density measurements were taken along the 88, 148, and 208 degree radials at four meter intervals starting at the tower base. Radial 148 coincides with the approximate center of the KVKR directional antenna's main radiation lobe, and radials 88 and 208 represent the approximate northeastern and southwestern main lobe beamwidth limits; Radiation levels encountered in other directions will be much lower. The data is presented in Figure 8.2d, wherein the measurements for each radial are depicted as a separate graph. Although the measurements do not match the model exactly, they do indicate a general trend similar to the FM model predictions with no "hot spots" that exceed the 200 microwatt per square centimeter limit. Deviations from the predictions along and between the radials are most likely due to environmental factors, including proximity to the transmitter building (which lies near radial 148), uneven terrain, and non-uniform patches of snow surrounding the tower. All measurements were taken using an Extech Instruments Model 480836 Radio Frequency Field Strength Meter purchased in June 2008. It is equipped with a triaxial broadband probe covering a frequency range of 50 to 3500 MHz, which encompasses the entire FM broadcast band. It is designed specifically for use in performing RF power density measurements to determine compliance with established safety standards such as those mandated by OET.