

RFR STUDY

The permittee/licensee has made proper radiofrequency electromagnetic (RF) field strength measurements throughout the transmitter site area to determine if there are any areas that exceed the FCC guidelines for human exposure to RF fields.

The following RFR measurements were collected by the undersigned on October 14, 2011, at the Hogback Mountain, Montana, high-powered communications site which is home to the following broadcast facilities:

KIMO(FM)	(see BMPH-20110801AQX)*
KMXM(FM)	(see BPH-20110527BHP)*
KTVH-TV	(see BLCDT-20100920ABN)
KMTF-TV	(see BLCDT-20060510ABS)

*It should be noted that KIMO(FM) and KMXM(FM) conducted equipment tests simultaneously and are filing FCC Form 302 Application for license to cover their respective permits using the instant RFR Report.

The RFR measurement equipment used was a Holaday Model HI-2200 with a serial number 00045654. The probe used was an E100 with a serial number of 00056628 and a frequency range applicable to the FM broadcast band. All data noted was measured in micro watts per square centimeter.

As can be shown by the data on the following page, most areas comply with the Uncontrolled Standard, or 200 micro watts per square centimeter. However, there is an area within 15 feet of the tower below its northeast face that exceeds the Uncontrolled Standard. The highest measurement recorded was 292 micro watts per square centimeter, which is 46% higher than the Uncontrolled Standard.

A special operating conditions or restrictions of the underlying permit states "If

necessary, a fence must be erected at such distances and in such a manner as to prevent the exposure of humans to RF fields in excess of the FCC Guidelines (OET Bulletin No. 65, Edition 97-01, August 1997). The fence must be a type which will preclude casual or inadvertent access, and must include warning signs at appropriate intervals which describe the nature of the hazard. Any areas within the fence found to exceed the recommended guidelines must be clearly marked with appropriate visual warning signs.”

In reviewing page 53 of OET Bulletin No. 65, Edition 97-01, August 1997 (the “Bulletin”), the FCC notes that, “There may be situations where RF levels may exceed the MPE limits for the general public in remote areas, such as mountain tops, that could conceivably be accessible but are not likely to be visited by the public. In such cases, common sense should dictate how compliance is to be achieved. If the area of concern is properly marked by appropriate warning signs, fencing or the erection of other permanent barriers may not be necessary.”

This guidance is also repeated in Appendix B of the Bulletin, Summary of the 1986 Mass Media Bureau Public Notice on RF Compliance, for the following situation: “High RF levels are produced at ground level in a remote area not likely to be visited by the public: If the area of concern is marked by appropriate warning signs, an applicant may assume that there is no significant effect on the human environment with regard to exposure of the general public.”

The permittee/licensee has installed warning signs encircling the area beneath the tower where RFR levels were measured in excess of the Uncontrolled Standard. The attached sketch of the antenna site’s RFR measurements includes the locations of the various warning signs. The permittee/licensee certifies that the antenna site is located on a remote mountain top. The nearest house or structure is located some 14 miles from the antenna site. The site is inaccessible to car from November through July due to snow. Also, there is no evidence of the public spending any time at the antenna site where the Uncontrolled Standard is exceeded (no litter, fire rings, camp sites, parking areas). Therefore, the facility complies with the Bulletin with regard to RFR exposure.

