

Environmental Effects

Educational Media Foundation (“EMF”) certifies that KLDV complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments.

The RF worksheet in the Instructions to form 303-S was unusable to determine compliance for this facility because the facility is shared with a television broadcast facility. After learning that KRMT has not built their Construction Permit, EMF continues to rely on its 2006 RF study to demonstrate compliance (copy attached). Based on this study, and the continuing presence of appropriate fencing and signage, the site fully complies with the FCC’s maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments.

Radio Frequency Safety Plan For Chief Mountain



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Radio Frequency Safety Plan For Chief Mountain

1.0 Purpose

Exposure to high levels of radio frequency energy can be harmful. Chief Mountain is an antenna site with several high-power transmitters and harmful exposure is possible if precautions are not taken. To help ensure your safety, we have prepared this radio frequency safety plan. Please read the plan in its entirety and follow its guidelines. If you have questions regarding this plan, please consult one of the broadcast engineers for the site:

91.1-FM (KLDV)	Bob Helms	(303) 881-4949	<i>bhelms@emfbroadcasting.com</i>
105.1-FM (KXKL)	Barry Walters	(303) 549-1009	<i>bawalters@cbs.com</i>
Channel 41-TV/40-DT	Kevin Russell	(303) 618-5466	<i>kevin.russell@daystar.com</i>

2.0 Procedures

Everyone on the site should follow these guidelines:

- Only authorized personnel are allowed on the site.
- Obey all posted signs.
- Assume all antennas are active unless proven otherwise.
- Before working on an antenna, notify the owner and disable the transmitter.
- When climbers are on the tower, broadcast engineers must place transmitter systems in local control (vice remote control) and must operate from standby antennas.
- Use a radio frequency (RF) personal monitor when working near antennas.
- Never operate transmitters without shields.
- Persons lacking RF safety training must be escorted when working on the site.

Radio frequency power densities at ground level on Chief Mountain are measured regularly and the area with levels exceeding the FCC occupational limit are marked with warning signs and roped off as shown in Figure 1.

WARNING: You must reduce transmitter power of Channel 41-TV, Channel 40-DT, 91.1-FM and 105.1-FM before working in this area. Operating from standby antennas is strongly recommended because it may be impossible to reduce power on the main antennas enough to create safe exposure levels on the ground.

Power densities on the tower can be much higher than on the ground. For this reason, tower climbers must request that all broadcasters on the tower switch to standby antennas before

climbing the tower. All climbers must carry RF personal monitors when climbing towers so they can independently verify that transmitters are turned off.

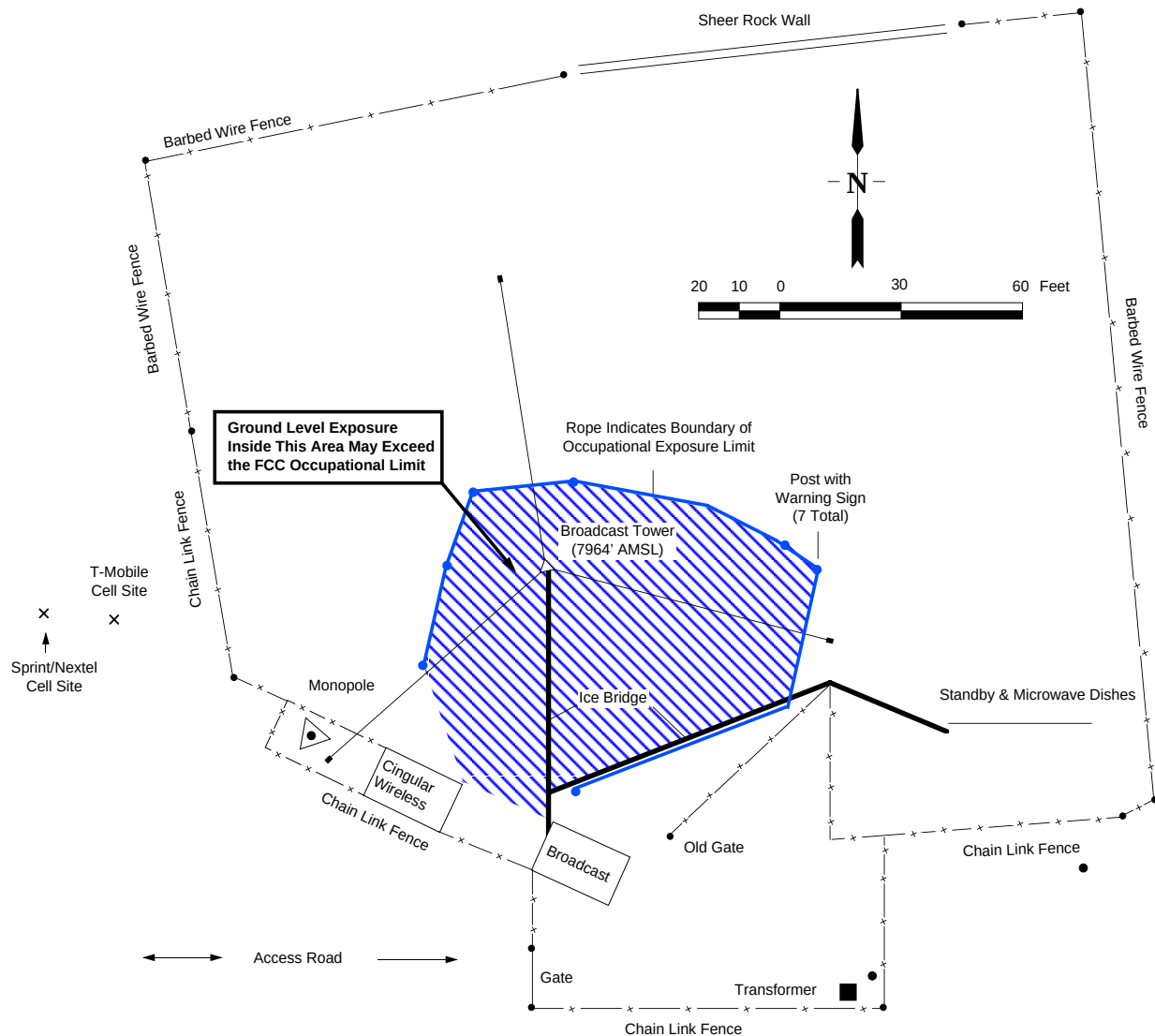


Figure 1 - Chief Mountain Antenna Site

The remainder of this plan provides background information on the site and the methods in place to ensure compliance with FCC radio frequency exposure guidelines.

3.0 Background Information

The Chief Mountain broadcast site is located at 39° 35' 59" N, 105° 12' 35" W (NAD 27) at an elevation of 7,964' above mean sea level (AMSL). The site is situated roughly one mile southeast of Tiny Town. The site proprietor is Cowskin Broadcasting, LLC - Stoen Joint Venture. There are four tenants on the broadcast site: KLDV-FM, KXKL-FM, KRMT-TV,

and Cingular Wireless. Sprint/Nextel and T-Mobile operate cell sites on separate property immediately adjacent to the site.

The three broadcast tenants operate from a 101' tall Rohn 65 guyed tower. Cingular Wireless operates from a separate 20' tall monopole. In addition to the main broadcast tower, there is a standby antenna facility located to the east of the Rohn tower. This standby facility has two single-bay broadcast FM antennas (5 kW each) and several studio-to-transmitter link (STL) antennas. The site layout is shown in Figure 1 above. The frequencies, effective radiated powers (ERPs) and antenna heights for the three broadcast tenants are listed in Table 1.

Table 1 - Broadcast Tenant Data (As of September 11, 2006)			
Tenant	Frequency	ERP	Height (AGL)
KLDV-FM	91.1 MHz	100 kW	70'
KXKL-FM	105.1 MHz	100 kW	71'
KXKL-Digital (IBOC)	105.1 MHz	1 kW	71'
KRMT-TV Ch. 41	633.25 MHz	2,223 kW	26'
KRMT-DT Ch. 40	629 MHz	74.8 kW	26'

The current tower configuration is shown in Figure 2. Figure 3 is a photograph of the tower as it appeared on September 11, 2006.

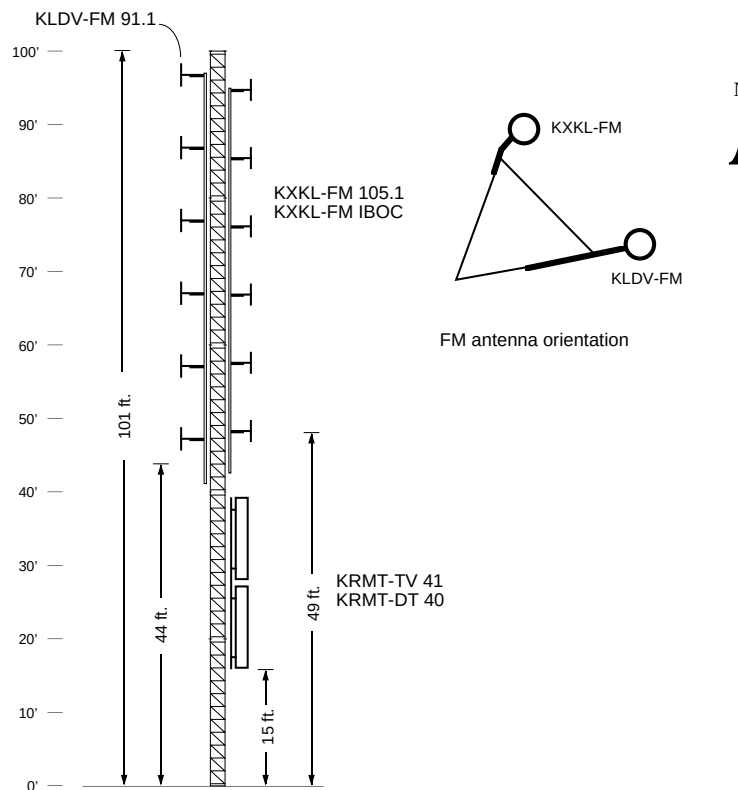


Figure 2 - Broadcast Tower on Chief Mountain

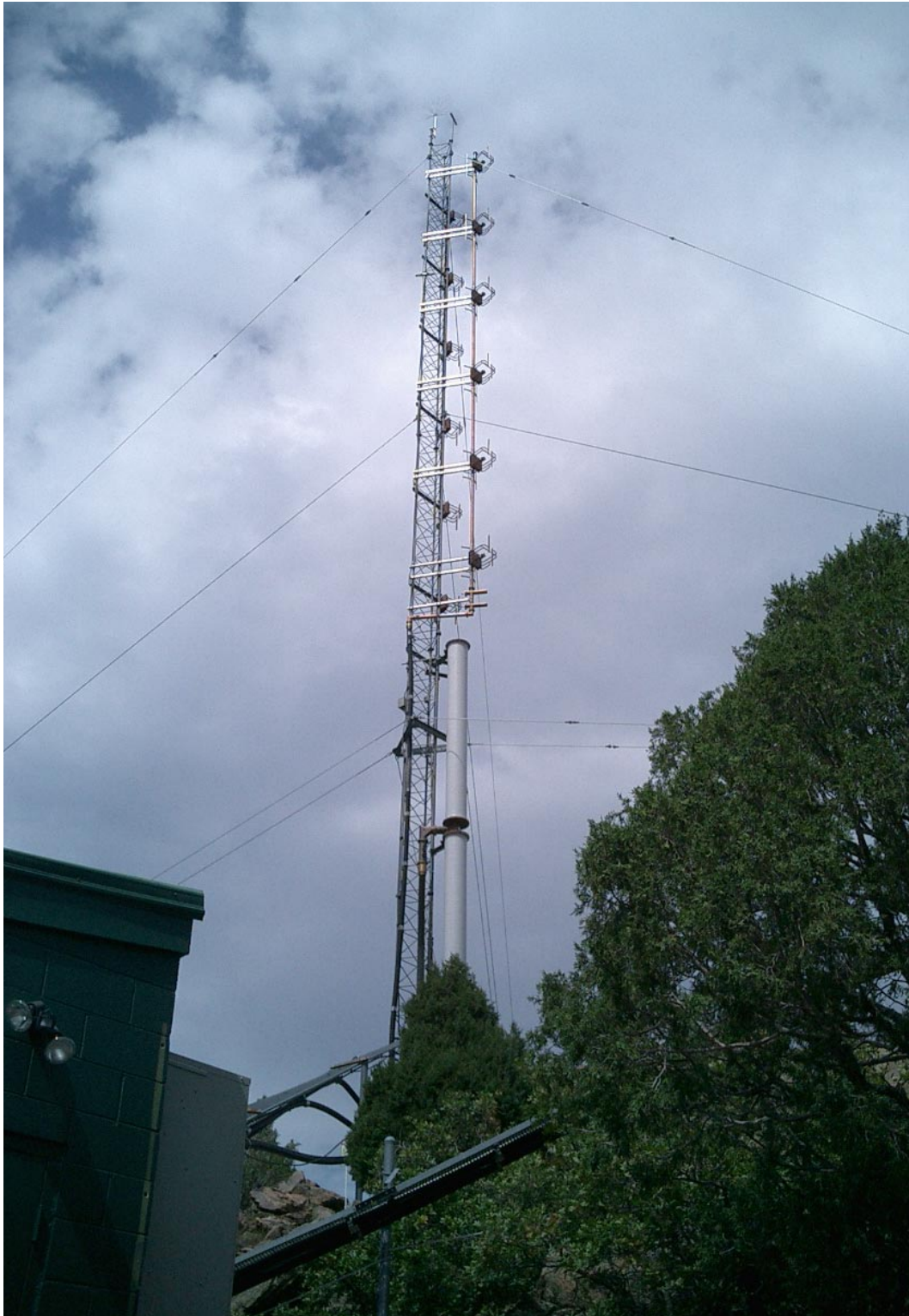


Figure 3 - Chief Mountain Broadcast Tower
(KRMT-TV at Bottom, KLDV-FM Antenna in Foreground, KXKL-FM in Background)

Prior to the most recent 2006 exposure surveys, the site had been measured twice previously by Pericle Communications Company, first in 1999 and again in 2000.¹ At that time, several locations inside the fenced area were measured at levels exceeding the occupational exposure limit. In our 1999 report, we recommended that the site owner extend the existing fence to encompass the entire site and that signs be posted to clearly define those areas inside the fence that exceeded the occupational limit. These improvements were in place during the surveys of April 4, 2006 and September 11, 2006. Today, there are two layers of protection:

- The perimeter fence defines a boundary of the public exposure limit and signs are posted on the fence indicating that exposure levels inside the fence may exceed both the public and occupational exposure limits. Only those personnel falling into the occupational category are allowed unescorted access to the site inside the perimeter fence. All others must be escorted.
- A roped off area inside the fenced area defines a boundary inside of which exposure may exceed the FCC occupational limit. Warning signs are posted at the perimeter of this area.

The vehicle gate at the site is locked at all times and a second locked gate at the base of the mountain prevents the public from reaching the site via motor vehicles.

Exposure measurements were taken on September 11, 2006. Present during the survey were Jay Jacobsmeyer (*Pericle*) and Bob Helms (*KLDV-FM*). The test instrument is identified in Table 2.

Table 2 - Test Equipment Used in Survey		
Instrument	Serial Number	Calibration
Wandel & Goltermann EMR-300	B-0053	4/05
Wandel & Goltermann Type 25.1 Probe, 300 kHz - 40 GHz	B-0053	4/05

The W&G probe and meter record power density as percent of the FCC controlled environment standard. Measurements were collected at the numbered locations shown in Figure 4.

Measurement results are listed in Table 3. Each location is identified as occupational exposure or public exposure depending on whether the location is inside or outside the perimeter fence. The reading is percent of the applicable limit (occupational or public). Each measurement is a spatial average and four spatial average measurements were taken at each location and averaged together to produce the final reading.

Any reading below 100% is in compliance, but even readings above 100% of the occupational

¹“Non-Ionizing Electromagnetic Radiation (NIER) Study Chief Mountain,” Jefferson County, Colorado VoiceStream Wireless, Nov 3, 1999. “Non-Ionizing Electromagnetic Radiation (NIER) Study Chief Mountain,” Jefferson County, Colorado KWBI-FM, Jul 21, 2000.

limit do not violate FCC guidelines as long as access to the area is restricted, warning signs are posted, and power is reduced when working in the area.

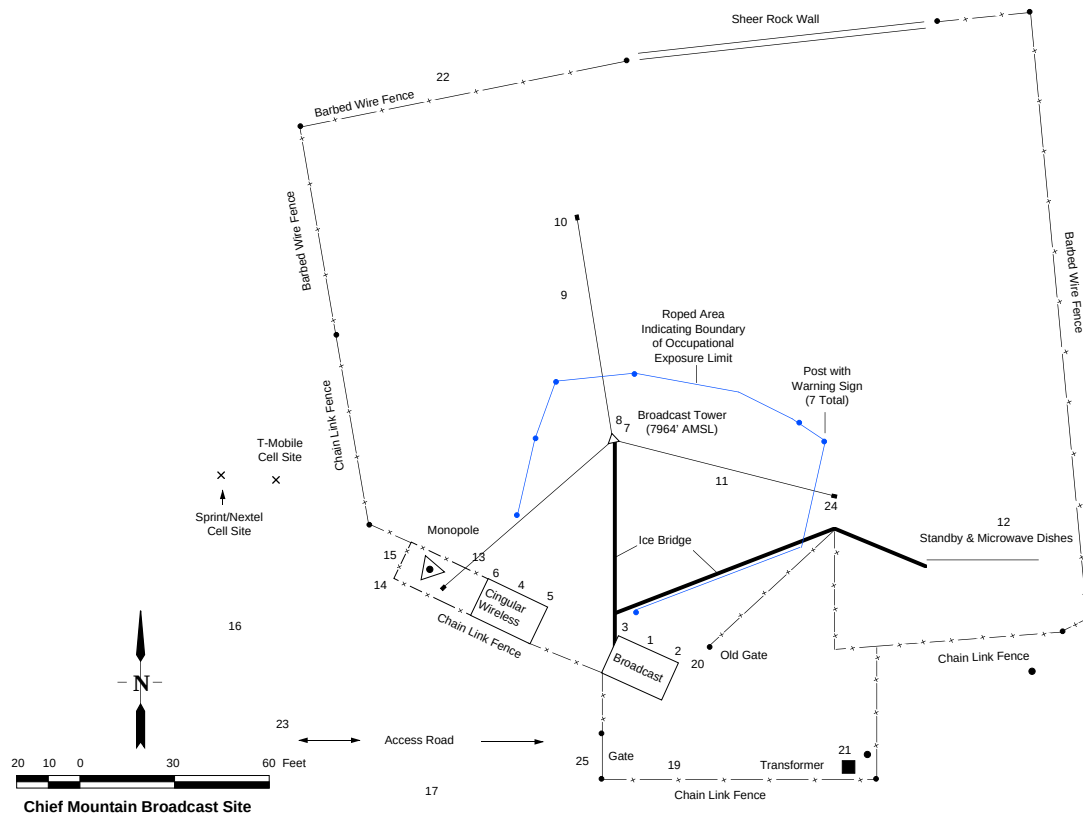


Figure 4 - Measurement Locations

There are two locations inside the fenced area that exceed the occupational exposure limit, but both locations are inside the roped off area.

4.0 References

- [1] ANSI C95.1-1999, "Safety levels with respect to human exposure to radio frequency electromagnetic fields, 3 kHz to 300 GHz."
- [2] OET Bulletin No. 65, FCC, "Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields," Edition 97-01, August 1997.
- [3] ANSI C95.3-2002, "Recommended practice for the measurement of hazardous electromagnetic fields - RF and microwave."

[4] ANSI C95.2-1981, "American National Standard radio frequency radiation hazard warning symbol."

[5] Code of Federal Regulation, Title 47, Parts 1.1307 - 1.1310, October 1, 2006.

[6] FCC OET Bulletin 56, 4th Ed., Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency Electromagnetic Fields, August, 1999.

Table 3 - Power Density Measurements (See Figure 4 for Locations, Measurements are Spatial Averages)		
Location	Type	Power Density
1	Occupational	31.6%
2	Occupational	17.0%
3	Occupational	18.7%
4	Occupational	93.6%
5	Occupational	85.5%
6	Occupational	48.0%
7	Occupational	119.9%
8	Occupational	68.9%
9	Occupational	71.5%
10	Occupational	92.3%
11	Occupational	108.8%
12	Occupational	5.1%
13	Occupational	11.5%
14	Public	12.6%
15	Public	18.0%
16	Public	2.6%
17	Public	13.0%
18	Public	2.6%
19	Occupational	4.2%
20	Occupational	7.4%
21	Occupational	7.3%
22	Public	5.4%
23	Public	3.5%
24	Occupational	48.9%
25	Public	15.6%
26	Public	0.0%

5.0 Distribution

Chief Mountain Transmitter Building	1
KRMT-TV (Kevin Russell)	1
KLDV-FM (Bob Helms)	1
KXKL-FM (Barry Walters)	1
Cingular Wireless	1
Cowskin Broadcasting, LLC - Stoen Joint Venture	1
Jefferson County (courtesy copy)	1