Arthur Doak

From: Robert Kelley [rkelley@guamtech.com]

Sent: Tuesday, July 10, 2012 11:49 AM

To: Arthur Doak

Subject: Re: Request to eliminate special operating condition KMOY - Facility ID 177536. CP BNPH-20071128ANZ

Thank you! I understand. Your analgesia is correct.

On Tue, Jul 10, 2012 at 8:42 AM, Arthur Doak <<u>Arthur.Doak@fcc.gov</u>> wrote:

Mr. Kelly:

The 2001 measurements show the site, at Property Line #5, to be 0.199 mW/cm2. This is 99.5% of the public limit at the property line. In addition, the site sketch shows "Retirement Housing Units" near the site. The addition of your station, even at one-half power as requested in your July 5, 2012 e-mail, could make the site exceed the public limit outside the fence. Therefore, we still need the RF measurements to ensure that the site complies with the FCC's RF guidelines and at this time we will not remove the conditions that require RF measurements be taken at the site before program test authority is granted.

Arthur E. Doak Audio Division Media Bureau FCC (202) 418-2715

From: Robert Kelley [mailto:rkelley@guamtech.com]
Sent: Monday, July 09, 2012 04:40 PM
To: Rodolfo Bonacci
Cc: Penelope Dade; Dale Bickel
Subject: Request to eliminate special operating condition KMOY - Facility ID 177536. CP BNPH-20071128ANZ

After discussion with Mr. Bonacci, I would like to withdraw my request for Program Test Authority for KMOY Facility ID 177536. The CP is BNPH-20071128ANZ. (see below). To date I have had no replies to my first email.

Instead I am requesting that the requirements for actual RF Safety Measurements at the site be eliminated from CP BNPH-20071128ANZ. (Condition 5). Please forward this email to the appropriate staff member and let me know who will be handling my request.

The site was surveyed when KOKU.Facility ID 25516 was installed and permitted. The KOKU antenna system was designed and manufactured by RFS systems of Melbourne, Australia.

The system is comprised a 4 panel RFS 904CP-4A FM Broadcast Transmitting Antenna array with an additional passive re-radiator element in the horizontal plane added between each panel and 3 additional passive re-radiator elements in the horizontal plane added below the lowest panel to equalize the horizontal and vertical gain of the antenna. The antenna panels are mounted with ½ wavelength spacing and the 90 degree horizontal beamwidth antenna system is oriented to the southwest (225 degrees) at 36 meters above ground level.

The antenna system was designed to provide effective suppression of radiation toward the ground level. The measurements of electric and magnetic fields at the KOKU transmitter site for operation with the antenna system at 50 kW effective radiated power showed that at all points measurements were substantially below the RF Levels mandated by FCC OET Bulletin No. 65 with the exception of the ground level of the guy wire anchor points of the

KOKU tower.

The licensee has expanded the perimeter of the protective fence to enclose KOKU Guy Wire anchor piers and control access to high electromagnetic field levels. The licensee also installed a protective fence around the entire property line further restricting access to the public. Pictures of site attached.

The collocation of KMOY with a maximum ERP of 42 KW will only increase the RF exposure by factor of 1.84. Therefore the site will remain in compliance of OET 65 requirements with site fenced and locked.

Guam is a remote location, over 6,000 miles from th west coast of the United States and it will be difficult to obtain a 3 axis RF survey meter before end of August.

KMOY is constructed and tested and is ready to be placed on the air. If the RF measurement requirement is removed, an application for licensing can =be submitted.

On Thu, Jul 5, 2012 at 2:51 PM, Robert Kelley <<u>rkelley@guamtech.com</u>> wrote: Sir,

I would like to request Program Test Authority for KMOY Facility ID 177536. The CP is BNPH-20071128ANZ.

The CP requires that RF Safety Measurements be completed prior to PTA. I will not have an XYZ Axis probe until August to perform an RF Survey of the transmitter site...

No spurious emissions were detected during the equipment testing utilizing a calibrated communications receiver.

KMOY will be using the same antenna as KOKU.Facility ID 25516. I am attaching the RF Feild Study completed for KOKU. Based upon the completed study,, the emissions will not exceed FCC OET Bulletin No. 65 Guidelines except at the marked Guy Wire anchor piers within the locked fence.

Based upon the above information, licensee requests authorization to operate KMOY under Program Test Authority at 1/2 power. Application for license to cover will be submitted within 60 days.

You may reaqch me at 909 213-0672 or email at rkelley@guamtech.com

Thank you!

Mr. Robert F. Kelley, Jr., CSRE, CBT, CBNT " <u>rkelley@guamtech.com</u>" Principal Consultant MCS, LLC (<u>671) 648-4262</u> (Office) (<u>671) 888-4262</u> (iCell) (<u>202) 318-2437</u> (Fax) 472-0400 (Guam Fax)

This email and attachments may contain privileged and confidential information intended only for the recipients. If you are not the intended recipient or the person responsible for delivery of this message to the intended recipient, please delete this message and do not distribute, copy, or retain this message. If you received this message in error, please notify us by telephone or e-mail.

Mr. Robert F. Kelley, Jr., RCDD/NTS/OSP/WD " <u>rkelley@guamtech.com</u>" Principal Consultant MCS, LLC (<u>671) 648-4262</u> (Office) (<u>671) 888-4262</u> (iCell) (<u>202) 318-2437</u> (Fax) 472-0400 (Guam Fax)

This email and attachments may contain privileged and confidential information intended only for the recipients. If you are not the intended recipient or the person responsible for delivery of this message to the intended recipient, please delete this message and do not distribute, copy, or retain this message. If you received this message in error, please notify us by telephone or e-mail.

Mr. Robert F. Kelley, Jr., RCDD/NTS/OSP/WD " <u>rkelley@guamtech.com</u>" Principal Consultant MCS, LLC (671) 648-4262 (Office) (671) 888-4262 (iCell) (202) 318-2437 (Fax) 472-0400 (Guam Fax)

This email and attachments may contain privileged and confidential information intended only for the recipients. If you are not the intended recipient or the person responsible for delivery of this message to the intended recipient, please delete this message and do not distribute, copy, or retain this message. If you received this message in error, please notify us by telephone or e-mail.