

PINNACLE TELECOM GROUP

Professional and Technical Services

ANTENNA SITE FCC RF COMPLIANCE ASSESSMENT AND REPORT

PREPARED FOR

CONNECTICUT DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION

“BRANFORD DOT Facility” SITE LEETES ISLAND ROAD BRANFORD, CT

AUGUST 11, 2020

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INTRODUCTION AND SUMMARY

At the request of the Connecticut Department of Emergency Services and Public Protection (DESPP) and related to its “Communications Upgrade Project”, Pinnacle Telecom Group has performed an independent expert assessment of radiofrequency (RF) levels and related FCC compliance for proposed wireless antenna operations on a new lattice tower to be located on Leetes Island Road in Branford, CT. The DESPP refers to the antenna site as “Branford DOT Facility”.

The FCC requires all wireless antenna operators to perform an assessment of potential human exposure to radiofrequency (RF) fields emanating from all the transmitting antennas at a site whenever antenna operations are added or modified, and to ensure compliance with the Maximum Permissible Exposure (MPE) limit in the FCC regulations. In this case, the compliance assessment will include proposed antenna operations by DESPP, the Town of Branford and the Town of Guilford. Note that FCC regulations require any future antenna collocators to assess and assure continuing compliance based on the RF effects of all proposed and then-existing antennas at the site.

This report describes a mathematical analysis of RF levels resulting around the site in areas of unrestricted public access, that is, at ground level around the site. The compliance analysis employs a standard FCC formula for calculating the effects of the antennas in a very conservative manner, in order to overstate the RF levels and to ensure “safe-side” conclusions regarding compliance with the FCC limit for safe continuous exposure of the general public.

The results of a compliance assessment can be explained in layman’s terms by describing the calculated RF levels as simple percentages of the FCC MPE limit. If the reference for that limit is 100 percent, then calculated RF levels higher than 100 percent indicate the MPE limit is exceeded, while calculated RF levels consistently lower than 100 percent serve as a clear and sufficient demonstration of compliance with the MPE limit.

The results of the FCC RF compliance assessment in this case are as follows:

- ❑ At street level around the site, the conservatively calculated maximum RF level from the proposed antenna operations is 0.3668 percent of the FCC general population MPE limit – well below the 100-percent reference for compliance. In other words, the worst-case RF level is more than 270 times below the limit established as safe for continuous human exposure to the RF emissions from antennas.
- ❑ The results of the calculations provide a clear demonstration that the RF levels from the proposed antenna operations will be in compliance with the applicable FCC regulations and MPE limit. Moreover, because of the conservative methodology and operational assumptions incorporated in the calculations, RF levels actually caused by the antennas will be even less significant than these calculations indicate.

The remainder of this report provides the following:

- ❑ relevant technical data on the proposed antenna operations at the site;
- ❑ a description of the applicable FCC mathematical model for assessing MPE compliance, and application of the relevant data to those models; and
- ❑ an analysis of the results, and a compliance conclusion for the antenna operations at this site.

In addition, Appendix A provides background on the FCC MPE limit, along with a list of FCC references on compliance. Appendix B provides a summary of the qualifications of the expert certifying FCC compliance for this site.

ANTENNA AND TRANSMISSION DATA

Relevant compliance-related antenna and transmission data for the proposed antenna operations is provided in the table that follows.

<i>Licensee</i>	<i>Freq Band</i>	<i>Antenna Mounting Height</i>	<i>Max Effective Radiated Power (ERP)</i>
DESPP	769 MHz	100 ft.	125 W
	851 MHz	100 ft.	200 W
Town of Branford	460 MHz	100 ft.	100 W
	453 MHz	70 ft.	100 W
Town of Guilford	453 MHz	60 ft.	100 W

Compliance Analysis

FCC Office of Engineering and Technology Bulletin 65 (“OET Bulletin 65”) provides guidelines for mathematical models to calculate the RF levels at various points around transmitting antennas.

At street-level around an antenna site (in what is called the “far field” of the antennas), the RF levels are directly proportional to the total antenna input power and the relative antenna gain in the downward direction of interest – and the levels are otherwise inversely proportional to the square of the straight-line distance to the antenna.

Conservative calculations also assume the potential RF exposure is enhanced by reflection of the RF energy from the intervening ground. Our calculations will assume a 100% “perfect”, mirror-like reflection, the worst-case approach.

The formula for street-level compliance assessment for any given antenna operation is as follows:

$$\text{MPE}\% = (100 * \text{Chans} * \text{TxPower} * 10^{(\text{Gmax}-\text{Vdisc}/10)} * 4) / (\text{MPE} * 4\pi * \text{R}^2)$$

where

- MPE% = RF level, expressed as a percentage of the MPE limit applicable to continuous exposure of the general public
- 100 = factor to convert the raw result to a percentage
- Chans = maximum number of RF channels per sector

- TxPower = maximum transmitter power per channel, in milliwatts
- $10^{(G_{max}-V_{disc}/10)}$ = numeric equivalent of the relative antenna gain in the downward direction of interest; data on the antenna vertical-plane pattern is taken from manufacturer specifications
- 4 = factor to account for a 100-percent-efficient energy reflection from the intervening ground, and the squared relationship between RF field strength and power density ($2^2 = 4$)
- MPE = FCC general population MPE limit
- R = straight-line distance from the RF source to the point of interest, centimeters

The MPE% calculations are performed out to a distance of 500 feet from the facility to points 6.5 feet (approximately two meters, the FCC-recommended standing height) off the ground, as illustrated in Figure 2, below.

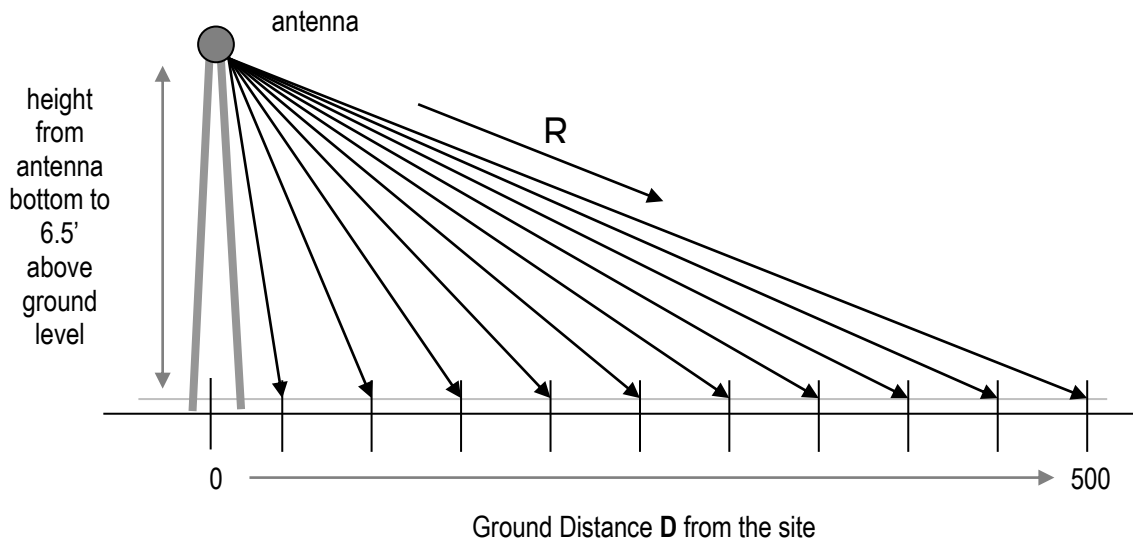


Figure 2. Street-level MPE% Calculation Geometry

It is popularly understood that the farther away one is from an antenna, the lower the RF level – which is generally but not universally correct. The results of MPE% calculations fairly close to the site will reflect the variations in the vertical-plane antenna pattern as well as the variation in straight-line distance to the antennas. Therefore, RF levels may actually increase slightly with increasing distance within the range of zero to 500 feet from the site. As the distance approaches 500 feet and beyond, though, the antenna pattern factor becomes less significant, the RF levels become primarily distance-controlled, and as a result the RF levels generally decrease with increasing distance, and are well understood to be in compliance.

Street-level FCC compliance for a collocated antenna site is assessed in the following manner. At each distance point along the ground, an MPE% calculation is made for each antenna operation, and the sum of the individual MPE% contributions at each point is compared to 100 percent, the normalized reference for compliance with the MPE limit. We refer to the sum of the individual MPE% contributions as “total MPE%”, and any calculated total MPE% result exceeding 100 percent is, by definition, higher than the FCC limit and represents non-compliance and a need to mitigate the potential exposure.

If all results are consistently below 100 percent, on the other hand, that set of results serves as a clear and sufficient demonstration of compliance with the MPE limit.

Note that according to the FCC, when directional antennas and sectorized coverage arrangements are used, the compliance assessments are based on the RF effect of a single (facing) sector, as the RF effects of directional antennas facing generally away from the point of interest are insignificant.

The following conservative methodology and assumptions are incorporated into the MPE% calculations on a general basis:

1. The antennas are assumed to be operating continuously at maximum power and maximum channel capacity.

2. The power-attenuation effects of shadowing or other obstructions to the line-of-sight path from the antenna to the point of interest are ignored.
3. The calculations intentionally minimize the distance factor (R) by assuming a 6'6" human and performing the calculations from the bottom (rather than the centerline) of each operator's lowest-mounted antenna, as applicable.
4. The potential RF exposure at ground level is assumed to be 100-percent enhanced (increased) via a "perfect" field reflection from the intervening ground.

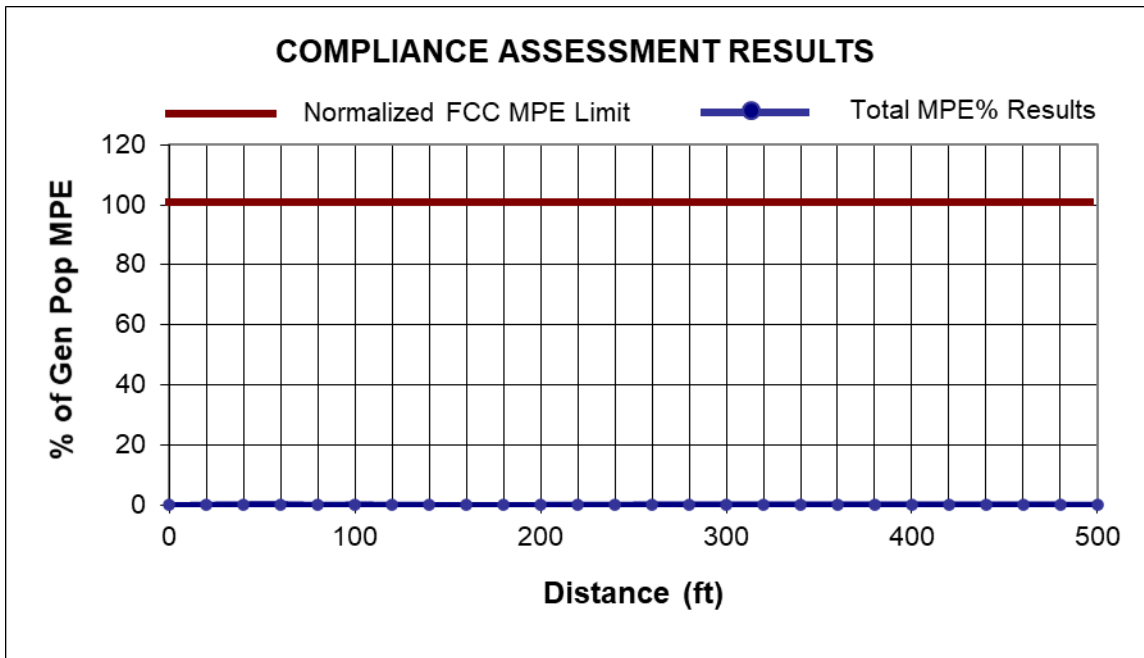
The net result of these assumptions is to significantly overstate the calculated RF exposure levels relative to the levels that will actually occur – and the purpose of this conservatism is to allow very "safe-side" conclusions about compliance.

The table that follows provides the results of the MPE% calculations, with the maximum calculated "Total MPE%" result highlighted in bold in the last column.

Ground Distance (ft)	DESPP MPE%	Town of Branford MPE%	Town of Guilford MPE%	Total MPE%
0	0.0022	0.0003	0.0006	0.0031
20	0.0398	0.0037	0.1403	0.1839
40	0.0232	0.2257	0.0451	0.2940
60	0.0000	0.2726	0.0942	0.3668
80	0.0008	0.1209	0.0186	0.1402
100	0.0127	0.1050	0.1189	0.2367
120	0.0002	0.0629	0.1229	0.1861
140	0.0090	0.0443	0.0469	0.1001
160	0.0017	0.0453	0.0191	0.0661
180	0.0051	0.0597	0.0117	0.0765
200	0.0102	0.0883	0.0208	0.1193
220	0.0050	0.0954	0.0340	0.1344
240	0.0000	0.1398	0.0480	0.1878
260	0.0043	0.1597	0.0619	0.2259
280	0.0067	0.1728	0.0748	0.2542
300	0.0070	0.1827	0.0654	0.2551
320	0.0051	0.1745	0.0758	0.2553
340	0.0025	0.1827	0.0840	0.2691
360	0.0009	0.1770	0.0751	0.2530
380	0.0014	0.1811	0.0675	0.2500
400	0.0013	0.1640	0.0733	0.2386
420	0.0034	0.1651	0.0666	0.2351
440	0.0057	0.1597	0.0702	0.2356
460	0.0053	0.1488	0.0643	0.2184
480	0.0049	0.1370	0.0591	0.2010
500	0.0056	0.1328	0.0545	0.1929

As indicated, even with the significant degree of conservatism built into the calculations, the maximum calculated RF level is 0.3668 percent of the FCC general population MPE limit – well below the 100-percent reference for compliance.

A graph of the overall calculation results, provided on the next page, provides perhaps a clearer *visual* illustration of the relative compliance of the calculated RF levels. The line representing the overall calculation results does not visibly rise above the graph's baseline, and shows an obviously clear, consistent margin to the FCC MPE limit.



Compliance Conclusion

According to the FCC, the MPE limit has been constructed in such a manner that continuous human exposure to RF fields up to and including 100 percent of the MPE limit is acceptable and safe.

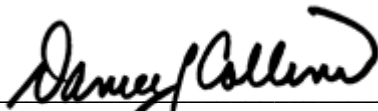
The conservative analysis in this case shows that the maximum calculated RF level from the combination of proposed and existing antenna operations at the site is 0.3668 percent of the FCC general population MPE limit. In other words, the worst-case calculated RF level is more than 270 times below the FCC MPE limit.

The results of the calculations provide a clear demonstration of FCC compliance. Moreover, because of the conservative calculation methodology and operational assumptions applied in the analysis, the RF levels actually caused by the antennas at the site will be even less significant than the calculations indicate.

CERTIFICATION

It is the policy of Pinnacle Telecom Group that all FCC RF compliance assessments are reviewed, approved, and signed by the firm's Chief Technical Officer who certifies as follows:

1. I have read and fully understand the FCC regulations concerning RF safety and the control of human exposure to RF fields (47 CFR 1.1301 *et seq*).
2. To the best of my knowledge, the statements and information disclosed in this report are true, complete and accurate.
3. The analysis of site RF compliance provided herein is consistent with the applicable FCC regulations, additional guidelines issued by the FCC, and industry practice.
4. The results of the analysis indicate that the subject antenna operations will be in compliance with the FCC regulations concerning the control of potential human exposure to the RF emissions from antennas.



Daniel J. Collins

8/11/20

Date

Appendix A. Background on the FCC MPE Limit

FCC Rules and Regulations

As directed by the Telecommunications Act of 1996, the FCC has established limits for maximum continuous human exposure to RF fields.

The FCC maximum permissible exposure (MPE) limits represent the consensus of federal agencies and independent experts responsible for RF safety matters. Those agencies include the National Council on Radiation Protection and Measurements (NCRP), the Occupational Safety and Health Administration (OSHA), the National Institute for Occupational Safety and Health (NIOSH), the American National Standards Institute (ANSI), the Environmental Protection Agency (EPA), and the Food and Drug Administration (FDA). In formulating its guidelines, the FCC also considered input from the public and technical community – notably the Institute of Electrical and Electronics Engineers (IEEE).

The FCC's RF exposure guidelines are incorporated in Section 1.301 *et seq* of its Rules and Regulations (47 CFR 1.1301-1.1310). Those guidelines specify MPE limits for both occupational and general population exposure.

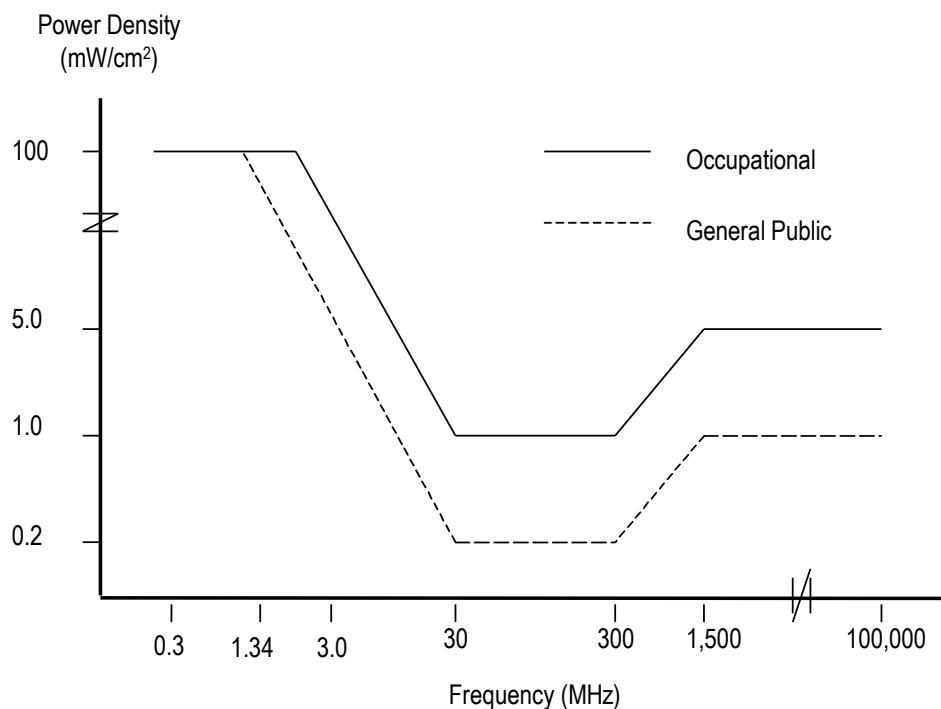
The specified continuous exposure MPE limits are based on known variation of human body susceptibility in different frequency ranges, and a Specific Absorption Rate (SAR) of 4 watts per kilogram, which is universally considered to accurately represent human capacity to dissipate incident RF energy (in the form of heat). The occupational MPE guidelines incorporate a safety factor of 10 or greater with respect to RF levels known to represent a health hazard, and an additional safety factor of five is applied to the MPE limits for general population exposure. Thus, the general population MPE limit has a built-in safety factor of more than 50. Continuous exposure at levels equal to or below the applicable MPE limits is considered to result in no adverse health effects on humans.

The reason for *two* tiers of MPE limits is based on an understanding and assumption that members of the general public are unlikely to have had appropriate RF safety training and may not be aware of the exposures they receive; occupational exposure in controlled environments, on the other hand, is assumed to involve individuals who have had such training, are aware of the exposures, and know how to maintain a safe personal work environment.

The FCC's RF exposure limits are expressed in two equivalent forms, using alternative units of field strength (expressed in volts per meter, or V/m), and power density (expressed in milliwatts per square centimeter, or mW/cm²). The table on the next page lists the FCC limits for both occupational and general population exposures, using the mW/cm² reference, for the different radio frequency ranges.

Frequency Range (F) (MHz)	Occupational Exposure (mW/cm ²)	General Public Exposure (mW/cm ²)
0.3 - 1.34	100	100
1.34 - 3.0	100	180 / F ²
3.0 - 30	900 / F ²	180 / F ²
30 - 300	1.0	0.2
300 - 1,500	F / 300	F / 1500
1,500 - 100,000	5.0	1.0

The diagram below provides a graphical illustration of both the FCC's occupational and general population MPE limits.



Because the FCC's RF exposure limits are frequency-shaped, the exact MPE limits applicable to the instant situation depend on the frequency range used by the systems of interest.

The most appropriate method of determining RF compliance is to calculate the RF power density attributable to a particular system and compare that to the MPE limit applicable to the operating frequency in question. The result is usually expressed as a percentage of the MPE limit.

For potential exposure from multiple systems, the respective percentages of the MPE limits are added, and the total percentage compared to 100 (percent of the limit). If the result is less than 100, the total exposure is in compliance; if it is more than 100, exposure mitigation measures are necessary to achieve compliance.

References on FCC Compliance

47 CFR, FCC Rules and Regulations, Part 1 (Practice and Procedure), Section 1.1310 (Radiofrequency radiation exposure limits).

FCC Second Memorandum Opinion and Order and Notice of Proposed Rulemaking (FCC 97-303), *In the Matter of Procedures for Reviewing Requests for Relief From State and Local Regulations Pursuant to Section 332(c)(7)(B)(v) of the Communications Act of 1934 (WT Docket 97-192), Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation (ET Docket 93-62), and Petition for Rulemaking of the Cellular Telecommunications Industry Association Concerning Amendment of the Commission's Rules to Preempt State and Local Regulation of Commercial Mobile Radio Service Transmitting Facilities*, released August 25, 1997.

FCC First Memorandum Opinion and Order, ET Docket 93-62, *In the Matter of Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation*, released December 24, 1996.

FCC Report and Order, ET Docket 93-62, *In the Matter of Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation*, released August 1, 1996.

FCC Report and Order, Notice of Proposed Rulemaking, Memorandum Opinion and Order (FCC 19-126), *Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields; Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies*, released December 4, 2019.

FCC Office of Engineering and Technology (OET) Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", Edition 97-01, August 1997.

FCC Office of Engineering and Technology (OET) Bulletin 56, "Questions and Answers About Biological Effects and Potential Hazards of RF Radiation", edition 4, August 1999.

"RF Field Measurements for Antenna Sites", (video), Richard Tell Associates Inc., 1997.

"EME Awareness for Antenna Site Safety", (video), Motorola (produced in association with Richard Tell Associates Inc.), 1997.

Appendix B. SUMMARY of EXPERT QUALIFICATIONS

Daniel J. Collins, Chief Technical Officer, Pinnacle Telecom Group, LLC

<p>Synopsis:</p>	<ul style="list-style-type: none"> • 40+ years of experience in all aspects of wireless system engineering, related regulation, and RF exposure • Has performed or led RF exposure compliance assessments on more than 20,000 antenna sites since the latest FCC regulations went into effect in 1997 • Has provided testimony as an RF compliance expert more than 1,500 times since 1997 • Have been accepted as an FCC compliance expert in Connecticut, New Jersey, New York, Pennsylvania and more than 40 other states, as well as by the FCC
<p>Education:</p>	<ul style="list-style-type: none"> • B.E.E., City College of New York (Sch. Of Eng.), 1971 • M.B.A., 1982, Fairleigh Dickinson University, 1982 • Bronx High School of Science, 1966
<p>Current Responsibilities:</p>	<ul style="list-style-type: none"> • Leads all PTG staff work involving RF safety and FCC compliance, microwave and satellite system engineering, and consulting on wireless technology and regulation
<p>Prior Experience:</p>	<ul style="list-style-type: none"> • Edwards & Kelcey, VP – RF Engineering and Chief Information Technology Officer, 1996-99 • Bellcore (a Bell Labs offshoot after AT&T's 1984 divestiture), Executive Director – Regulation and Public Policy, 1983-96 • AT&T (Corp. HQ), Division Manager – RF Engineering, and Director – Radio Spectrum Management, 1977-83 • AT&T Long Lines, Group Supervisor – Microwave Radio System Design, 1972-77
<p>Specific RF Safety / Compliance Experience:</p>	<ul style="list-style-type: none"> • Involved in RF exposure matters since 1972 • Have had lead corporate responsibility for RF safety and compliance at AT&T, Bellcore, Edwards & Kelcey, and PTG • While at AT&T, helped develop the mathematical models for calculating RF exposure levels • Have been relied on for compliance by all major wireless carriers, as well as by the federal government, several state and local governments, equipment manufacturers, system integrators, and other consulting / engineering firms
<p>Other Background:</p>	<ul style="list-style-type: none"> • Author, <i>Microwave System Engineering</i> (AT&T, 1974) • Co-author and executive editor, <i>A Guide to New Technologies and Services</i> (Bellcore, 1993) • National Spectrum Management Association (NSMA) – former three-term President and Chairman of the Board of Directors; was founding member, twice-elected Vice President, long-time member of the Board, and was named an NSMA Fellow in 1991 • Have published more than 35 articles in industry magazines