



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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E-Mail: siting.council@po.state.ct.us

Web Site: www.state.ct.us/csc/index.htm

September 25, 2003

Christopher B. Fisher, Esq.

Cuddy & Feder LLP

90 Maple Avenue

White Plains, NY 10601-5196

RE: **EM-AT&T-111-030911** - AT&T Wireless PCS, LLC, notice of intent to modify an existing telecommunications facility located at 171 Town Hill Road, Plymouth, Connecticut.

Dear Attorney Fisher:

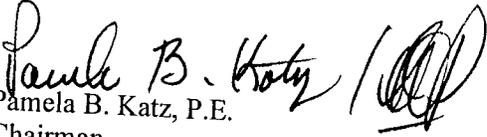
At a public meeting held on September 23, 2003, the Connecticut Siting Council (Council) acknowledged your notice to modify this existing telecommunications facility, pursuant to Section 16-50j-73 of the Regulations of Connecticut State Agencies.

The proposed modifications are to be implemented as specified here and in your notice received in our office on September 11, 2003. The modifications are in compliance with the exception criteria in Section 16-50j-72 (b) of the Regulations of Connecticut State Agencies as changes to an existing facility site that would not increase tower height, extend the boundaries of the tower site, increase noise levels at the tower site boundary by six decibels, and increase the total radio frequencies electromagnetic radiation power density measured at the tower site boundary to or above the standard adopted by the State Department of Environmental Protection pursuant to General Statutes § 22a-162. This facility has also been carefully modeled to ensure that radio frequency emissions are conservatively below State and federal standards applicable to the frequencies now used on this tower.

This decision is under the exclusive jurisdiction of the Council. Any additional change to this facility will require explicit notice to this agency pursuant to Regulations of Connecticut State Agencies Section 16-50j-73. Such notice shall include all relevant information regarding the proposed change with cumulative worst-case modeling of radio frequency exposure at the closest point of uncontrolled access to the tower base, consistent with Federal Communications Commission, Office of Engineering and Technology, Bulletin 65. Any deviation from this format may result in the Council implementing enforcement proceedings pursuant to General Statutes § 16-50u including, without limitation, imposition of expenses resulting from such failure and of civil penalties in an amount not less than one thousand dollars per day for each day of construction or operation in material violation.

Thank you for your attention and cooperation.

Very truly yours,


Pamela B. Katz, P.E.
Chairman

PBK/laf

c: Honorable David C. Mischke, Mayor, Town of Plymouth
William Kuehn, Town Planner, Town of Plymouth
Thomas J. Regan, Esq., Brown Rudnick Berlack Israels

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SEP 11 2003

**NOTICE OF INTENT TO MODIFY AN
EXISTING TELECOMMUNICATIONS FACILITY AT
171 TOWN HILL ROAD, PLYMOUTH, CONNECTICUT**

CONNECTICUT
SITING COUNCIL

Pursuant to the Public Utility Environmental Standards Act, Connecticut General Statutes § 16-50g et. seq. ("PUESA"), and Sections 16-50j-72(b) of the Regulations of Connecticut State Agencies adopted pursuant to the PUESA, AT&T Wireless PCS, LLC d/b/a AT&T Wireless ("AT&T Wireless") hereby notifies the Connecticut Siting Council of its intent to modify an existing facility located at 171 Town Hill Road, Plymouth, Connecticut (the "Town Hill Road Facility"), owned by T-Mobile USA, Inc. ("T-Mobile"). AT&T Wireless and T-Mobile have agreed to share the use of the Town Hill Road Facility, as detailed below.

The Town Hill Road Facility

The Town Hill Road Facility consists of an approximately one hundred seventy (170) foot monopole tower and associated equipment currently being used for wireless communications by T-Mobile, Sprint and the municipality. The Tower is located on a parcel of property used as a community "fairgrounds". Surrounding land uses are predominantly residential.

AT&T Wireless' Facility

As shown on the enclosed plans prepared by URS Corporation-AES, including a site plan and tower elevation of the Town Hill Road Facility, AT&T Wireless proposes shared use of the Facility by placing antennas on the Tower and equipment cabinets at grade needed to provide personal communications services ("PCS"). AT&T Wireless will install 6 panel antennas at approximately the 145 foot level of the Tower and associated equipment cabinets (2 proposed, 2 future, each 76"H x 30" W x 30" D) located on a concrete pad within the fenced compound. As evidenced in the structural evaluation prepared by Semaan Engineering Solutions, annexed hereto as Exhibit A, AT&T has confirmed that the Tower is structurally capable of supporting the addition of AT&T Wireless' antennas.

AT&T Wireless' Facility Constitutes An Exempt Modification

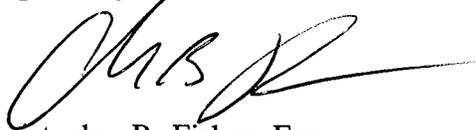
The proposed addition of AT&T Wireless' antennas and equipment to the Town Hill Road Facility constitutes an exempt "modification" of an existing facility as defined in Connecticut General Statutes Section 16-50i(d) and Council regulations promulgated pursuant thereto. Addition of AT&T Wireless' antennas and equipment to the tower will not result in an increase of the tower's height nor extend the site boundaries. Further, there will be no increase in noise levels by six (6) decibels or more at the tower site's boundary. As set forth in an Emissions Report prepared by Galen Belen, RF Engineer, annexed hereto as Exhibit B, the total radio frequency electromagnetic radiation power density at the tower site's boundary will not be

increased to or above the standard adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes and MPE limits established by the Federal Communications Commission. For all the foregoing reasons, addition of AT&T Wireless' facility to the tower constitutes an exempt modification which will not have a substantially adverse environmental effect.

Conclusion

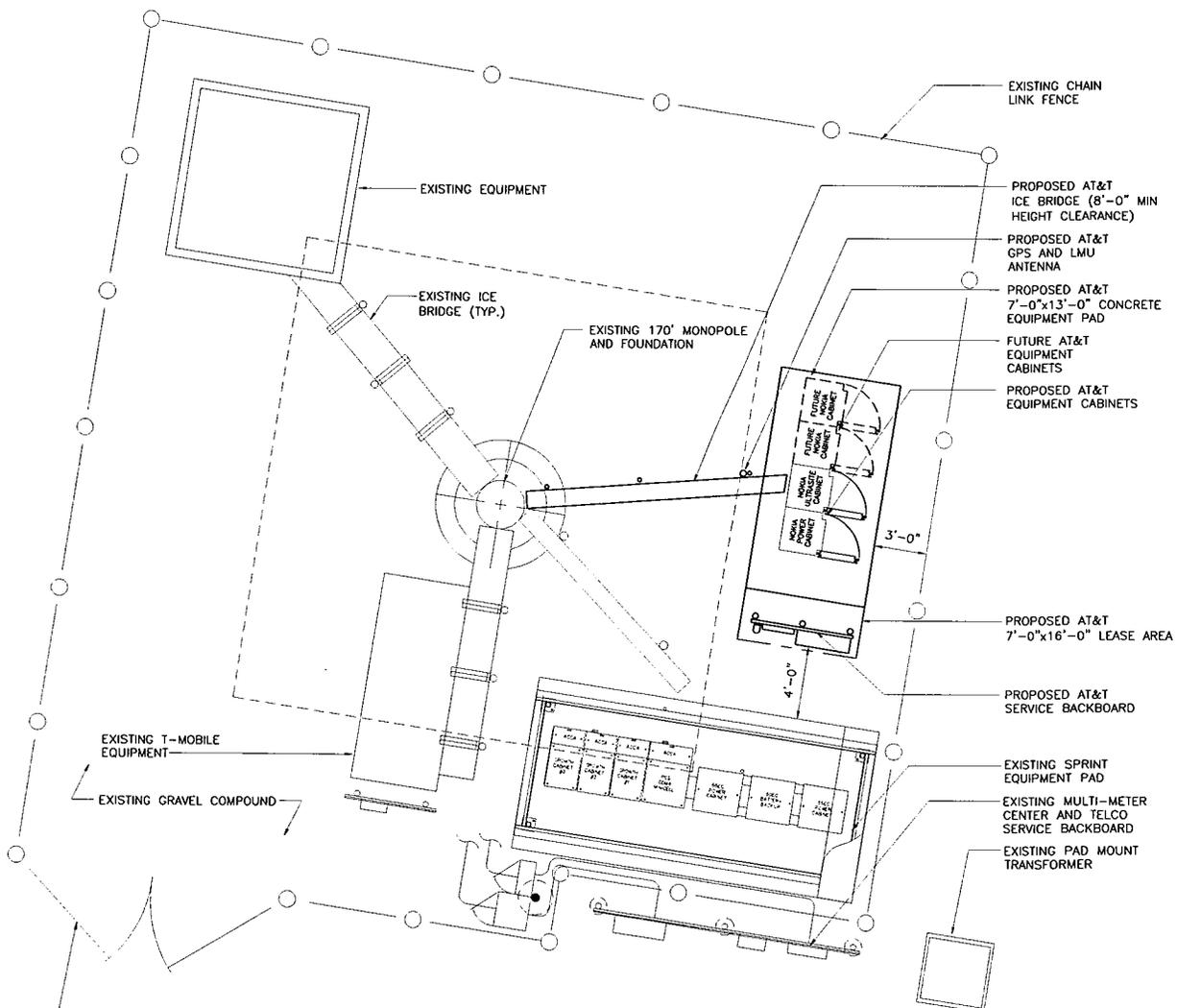
Accordingly, AT&T Wireless requests that the Connecticut Siting Council acknowledge that its proposed modification to the Town Hill Road Facility meets the Council's exemption criteria.

Respectfully Submitted,



Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: Mayor, Town of Plymouth
Johnny R. Salmon, Bechtel
Derek Fergus, Optasite



1 COMPOUND PLAN
 SC-1 SCALE: 1" = 10'-0"



SITING COUNCIL REVIEW

LATITUDE: 41.6883 (NAD 83)
 LONGITUDE: 73.0200 (NAD 83)

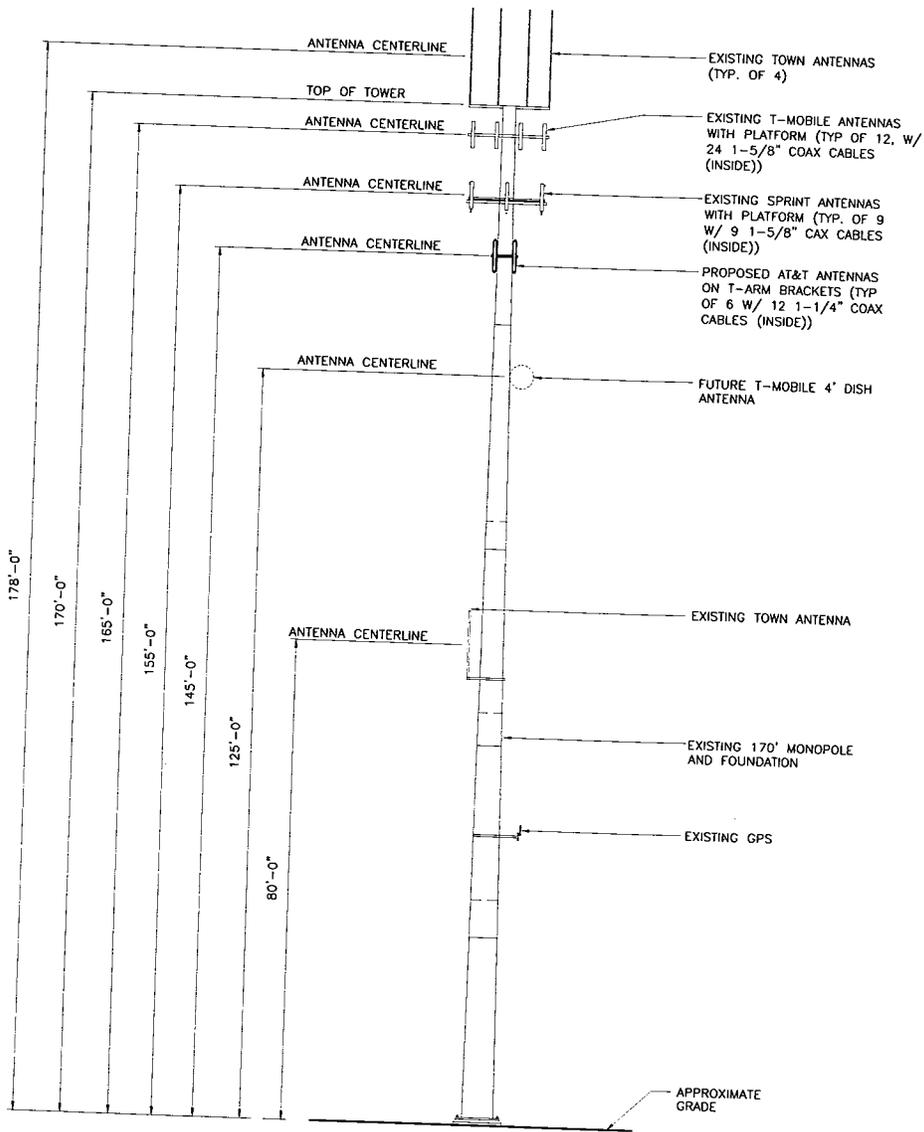
T-MOBILE SITE NUMBER: CT11417C SITE NAME: TERRYVILLE

URS
 URS CORPORATION-AES
 795 BROOK STREET, BLDG 5
 ROCKY HILL, CT. 06067
 1-(860)-529-8882
 1-(860)-529-5566 (FAX)

AT&T
 AT&T WIRELESS PCS LLC
 12 OMEGA DRIVE
 STAMFORD, CONNECTICUT 06902

DRAWING TITLE: COMPOUND PLAN
PROJECT INFORMATION:
 TERRYVILLE-LIONS CLUB PARK
 CT-832
 171 TOWN HILL ROAD
 PLYMOUTH, CT
TOWER OWNER:
 T-MOBILE
 16 WING DRIVE
 CEDAR KNOLLS, NEW JERSEY

DRAWING TITLE:	
907-007-832B-SC1	
REVISION NO. A	DRAWN BY: RB
DATE ISSUED: 05/08/03	CHECKED BY: JCF
SCALE: AS NOTED	APPROVED BY:
	SHEET NO. 1 OF 2
URS JOB NO.: BA1048 (36915203)	



1 TOWER ELEVATION
 SC-2 SCALE: 1" = 30'-0"

SITING COUNCIL REVIEW

T-MOBILE SITE NUMBER: CT11417C SITE NAME: TERRYVILLE

LATITUDE: 41.6883 (NAD 83)
 LONGITUDE: 73.0200 (NAD 83)

URS
 URS CORPORATION-AES
 795 BROOK STREET, BLDG 5
 ROCKY HILL, CT. 06067
 1-(860)-529-8882
 1-(860)-529-5566 (FAX)

AT&T
 AT&T WIRELESS PCS LLC
 12 OMEGA DRIVE
 STAMFORD, CONNECTICUT 06902

DRAWING TITLE: TOWER ELEVATION
 PROJECT INFORMATION:
 TERRYVILLE-LIONS CLUB PARK
 CT-832
 171 TOWN HILL ROAD
 PLYMOUTH, CT
 TOWER OWNER:
 T-MOBILE
 16 WING DRIVE
 CEDAR KNOLLS, NEW JERSEY

DRAWING TITLE:
 907-007-832B-SC2
 REVISION NO. A DRAWN BY: RB
 DATE ISSUED: 05/08/03 CHECKED BY: JCF
 SCALE: AS NOTED APPROVED BY:
 SHEET NO. 2 OF 2
 URS JOB NO.: BA1048 (36915203)

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1047 N. 204th Avenue
Elkhorn, NE 68022
Ph:402-289-1888
Fax:402-289-1861

SEMAAN ENGINEERING SOLUTIONS

170 ft PIROD Monopole
Structural Analysis

CT832B

Prepared for:
T-Mobile USA
12920 SE 38th Street
Bellevue, WA 98006

Site: CT11417C / Plymouth / AT&T
Plymouth, CT



April 29, 2003

Mr. Joseph Laurenzano
T-Mobile USA
12920 SE 38th Street
Bellevue, WA 98006

Re: Site Number CT11417C – Plymouth Verizon.

Dear Mr. Laurenzano:

We have completed the structural analysis for the existing monopole, located at the above referenced site. The purpose of this analysis is to determine that the existing monopole design is in conformance with the EIA/TIA-222-F standard for the proposed antennae loads installation. Refer to the Review and Recommendations section at the end of this report for the analysis results.

Description of Structure:

The structure is a 170 ft PIROD Monopole.

Refer to PIROD drawing 150737-B dated September 1, 2000 for a detailed description of the structure.

Method of analysis:

The tower was analyzed using Semaan Engineering Solutions' software suite for communication structures. The structural analysis is performed using the SAPS finite element engine. The method is 3D, non-linear, which accounts for the second order geometric effects due to the displacements. It also treats guys as exact cable elements and therefore is ideal for guyed towers. The analysis was performed in conformance with **EIA/TIA-222-F for a basic wind speed of 80 mph and 1/2" radial ice with reduced wind speed**. Wind is applied to the structure, accessories and antennas.

Previous Structure loading:**Maximum structure usage: 81.1%**

The information in the following table is an excerpt from the previous Semaan Engineering Solutions analysis dated October 15, 2001, and is provided for comparison only.

Elev. (ft)	Qty.	Antennas and Mounts	Coax	Owner
170.0	1	SRL-229 Mounted On a 4 omni mount	(1) 1-5/8 (Outside)	Town
170.0	1	PD455 Mounted On a 4 omni mount	(1) 1-5/8 (Outside)	Town
170.0	1	PD220 Mounted On a 4 omni mount	(1) 1-5/8 (Outside)	Town
170.0	1	ACP-305 Mounted On a 4 omni mount	(1) 1-5/8 (Outside)	Town
165.0	12	RR65-19-00XP w/Airtech LNA's Mounted On a 13 ft Low Profile platform	(24) 1-5/8 (Inside)	Voicestream (T-Mobile)
155.0	9	DB980H90 Mounted On a 13 ft Low Profile platform	(9) 1-5/8 (Outside)	Sprint
145.0	12	DB844H90EXY Mounted On a 13 ft Low Profile platform	(12) 1-5/8 (Outside)	Verizon
135.0	9	DAPA 3980.025 Mounted On a 13 ft Low Profile platform	(9) 1-5/8 (Outside)	AT&T
125.0	1	HP MW Dish, 4' Dia.	(1) 1-5/8 (Inside)	Voicestream (T-Mobile)

Structure loading for current analysis: Maximum structure usage: 58.8%.

Per the loading sheet supplied, the analysis was performed using the following loading: (Proposed loading in bold)

Elev. (ft)	Qty.	Antennas and Mounts	Coax	Owner
170.0	1	ACP-305 Mounted On a 4 omni mount	(1) 1-5/8 (Inside)	Town
170.0	1	PD220 Mounted On a 4 omni mount	(1) 1-5/8 (Inside)	Town
170.0	1	PD455 Mounted On a 4 omni mount	(1) 1-5/8 (Inside)	Town
170.0	1	SRL-229 Mounted On a 4 omni mount	(1) 1-5/8 (Inside)	Town
165.0	12	RR65-19-00XP w/Airtech LNA's Mounted On a 13 ft Low Profile platform	(24) 1-5/8 (Inside)	T-Mobile
155.0	9	DB980H90 Mounted On a 13 ft Low Profile platform	(9) 1-5/8 (Inside)	Sprint
145.0	6	Allgon 7250.03 Mounted On a 13 ft Low Profile platform	(12) 1-1/4 (Inside)	AT&T
125.0	1	HP MW Dish, 4' Dia.	(1) 1-5/8 (Inside)	T-Mobile
80.0	1	PD455 Mounted On a 4 FT Standoff	(1) 1-5/8 (Inside)	Town

All new access holes shall be reinforced with welded rims that are compatible with the pole and to be sized and supplied by pole manufacturer.

Results of Analysis:

Refer to the attached Computer Summary sheets for detailed analysis results.

Structure:

The existing monopole is structurally capable of supporting the existing and proposed antennas. The maximum structure usage is: 58.8%.

Foundation:

Pole Reactions	Original Design Reactions	Current Analysis Reactions	% Of Design
Moment (ft-kips)	4,181.30	2,722.48	65.1
Shear (kips)	34.20	23.41	68.5

The structure base reactions resulting from this analysis do not exceed the ones shown on the original structure drawings.

Review and Recommendations:

Based on the analysis results, the existing structure meets the requirements per the EIA/TIA-222-F standards for a basic wind speed of 80 mph and 1/2" radial ice with reduced wind speed.



RF Exposure Analysis for Proposed AT&T Wireless Antenna Facility

SITE ID: 907-007-832

May 13, 2003

Prepared by AT&T Wireless Services, Inc.
Galen Belen **RF Engineer**

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1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 171 Town Hill Road, Terryville, CT 06786. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: Terryville Central	
Number of simultaneously operating channels	12
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	145.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$PowerDensity = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} (mW/cm^2) \quad Eq. 1-Far-field$$

Where, N = Number of channels, R = distance in cm from the antenna centerline, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$PowerDensity = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} (mW/cm^2) \quad Eq. 2-Near-field$$

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance from the antenna centerline, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Emissions

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.000885 mW/cm² which occurs at 160 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000295 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF Emissions

Frequency	Public/Uncontrolled	Occupational/controlled	Maximum power density at Accessible location
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.000885 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

The maximum power density at the proposed facility represents only 0.24% of the public MPE limit for all frequencies in use.

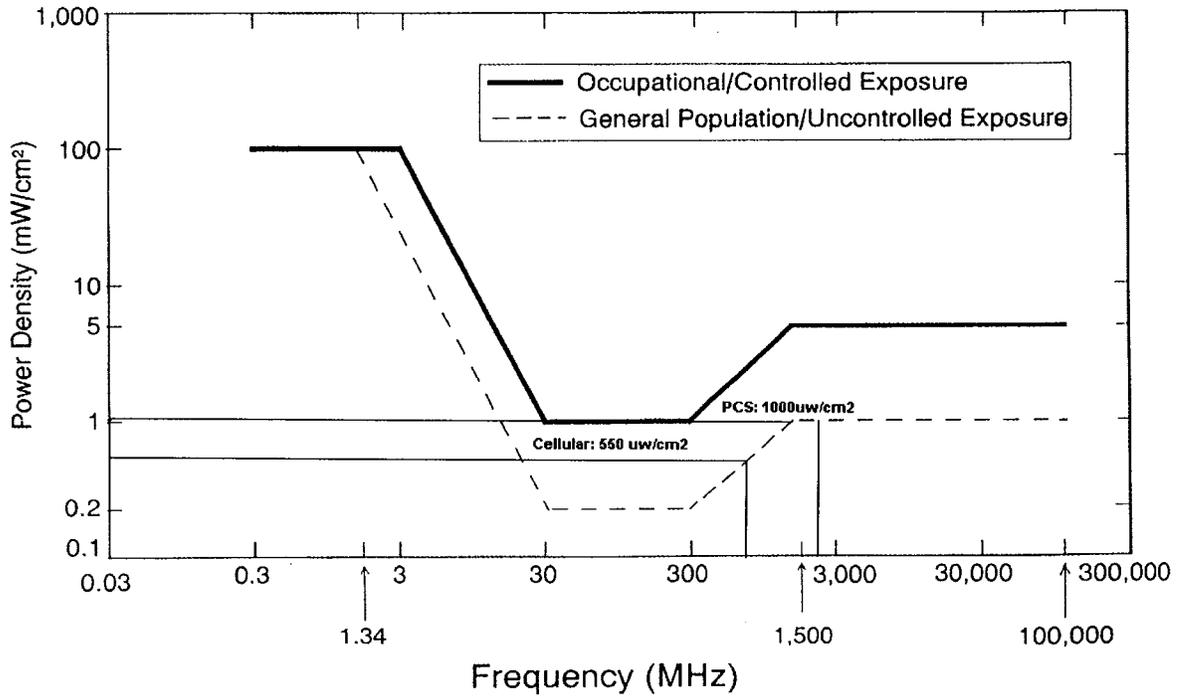
6. Conclusion

This analysis show that the maximum power density in accessible areas at this location is 0.000885 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

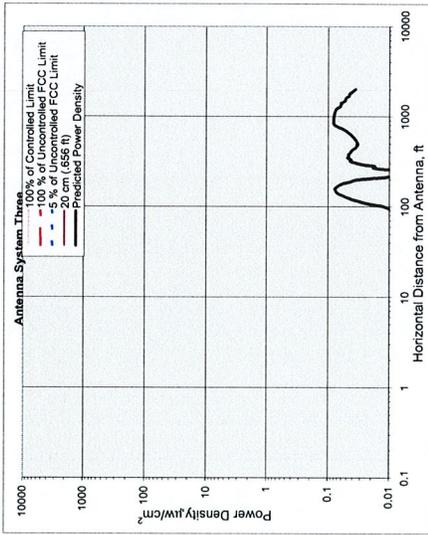
² 47 U.S. C. Section 332 (c) (7)(B)(iv) states that “[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emissions.”

7. FCC Limits for Maximum Permissible Exposure

FCC Limits for Maximum Permissible Exposure (MPE)
Plane-wave Equivalent Power Density



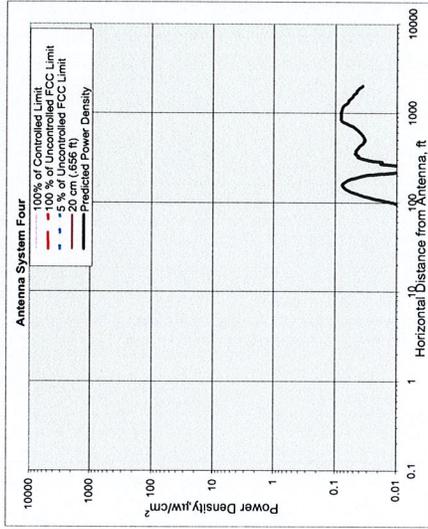
8. Exhibit A



Antenna System Three

Parameter	units	Value
Frequency	MHz	224.78
# of Channels	#	1
Max ERP/Ch	Watts	500.00
Max Pwr/Ch Into Ant.	Watts	126.46
Antenna Centerline	feet	178.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		SRL229
Max Ant Gain	dBd	5.97
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	21.00
Ant HBW	degrees	360.00
Distance to Ant _{system}	feet	161.50
WCS?	Y/N?	n

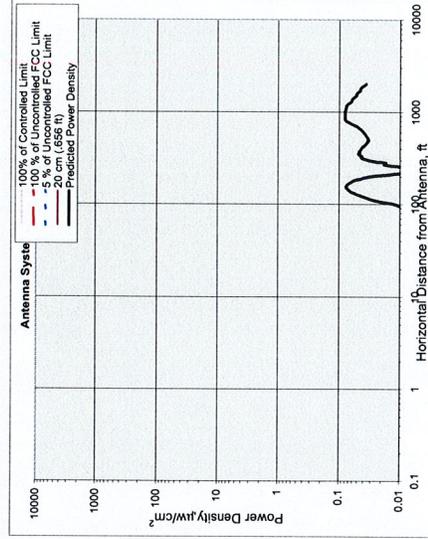
Ant System Three Owner: Town
Sector: 1
Azimuth: 360



Antenna System Four

Parameter	units	Value
Frequency	MHz	147.32
# of Channels	#	1
Max ERP/Ch	Watts	500.00
Max Pwr/Ch Into Ant.	Watts	126.46
Antenna Centerline	feet	178.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		SRL229
Max Ant Gain	dBd	5.97
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	21.00
Ant HBW	degrees	360.00
Distance to Ant _{system}	feet	161.50
WCS?	Y/N?	n

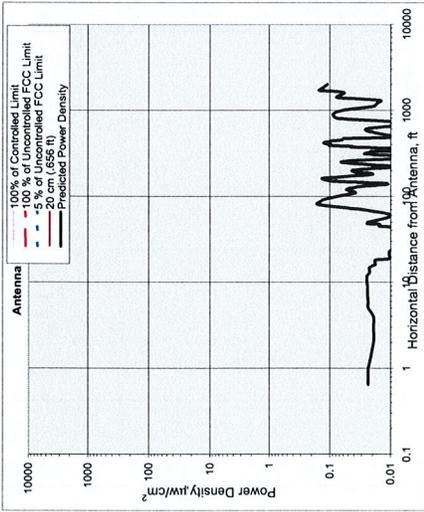
Ant System Four Owner: Town
Sector: 1
Azimuth: 360



Antenna System Five

Parameter	units	Value
Frequency	MHz	50.39
# of Channels	#	1
Max ERP/Ch	Watts	500.00
Max Pwr/Ch Into Ant.	Watts	126.46
Antenna Centerline	feet	178.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		SRL229
Max Ant Gain	dBd	5.97
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	21.00
Ant HBW	degrees	360.00
Distance to Ant _{system}	feet	161.50
WCS?	Y/N?	n

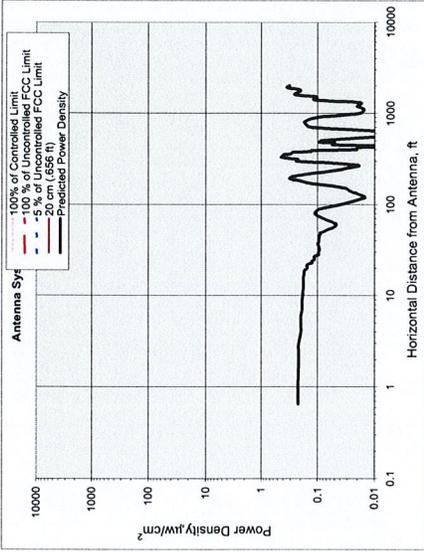
Ant System Five Owner: Town
Sector: 1
Azimuth: 360



Antenna System Six

Antenna	units	Value
Frequency	MHz	1930.00
# of Channels	#	12
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	5.73
Antenna Centerline	feet	165.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		RR65-19-00XP
Max Ant Gain	dBd	16.40
Down tilt	degrees	2.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	6.00
Ant HBW	degrees	65.00
Distance to Ant _{center}	feet	156.00
WOS?	Y/N?	n

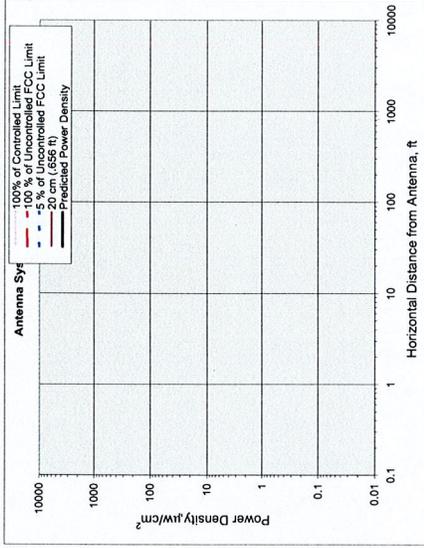
Ant System SIX Owner: T-Mobile
Sector: 3
Azimuth: 0/120/240



Antenna System Seven

Antenna	units	Value
Frequency	MHz	1962.50
# of Channels	#	24
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	7.73
Antenna Centerline	feet	155.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		DB980G90E-M
Max Ant Gain	dBd	15.10
Down tilt	degrees	2.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.00
Ant HBW	degrees	90.00
Distance to Ant _{center}	feet	146.50
WOS?	Y/N?	n

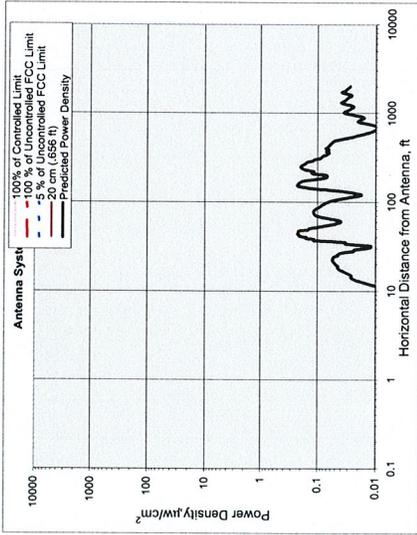
Ant System SEVEN Owner: Sprint
Sector: 3
Azimuth: 0/120/240



Antenna System Eight

Antenna	units	Value
Frequency	MHz	6425.00
# of Channels	#	1
Max ERP/Ch	Watts	1000.00
Max Pwr/Ch Into Ant.	Watts	0.21
Antenna Centerline	feet	125.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		UHX6-59
Max Ant Gain	dBd	36.70
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	6.00
Ant HBW	degrees	1.80
Distance to Ant _{center}	feet	116.00
WOS?	Y/N?	n

Ant System Eight Owner: T-Mobile
Sector: Microwave
Azimuth: 0



Antenna System Nine

Parameter	units	Value
Frequency	MHz	425.00
# of Channels	#	1
Max ERP/Ch	Watts	500.00
Max Pwr/Ch Into Ant.	Watts	50.00
Antenna Centerline	feet	80.00
Calculation Point (above ground or roof surface)	feet	6.00
Antenna Model No.		0.00
Max Ant Gain	dBd	DB64ONS
Down tilt	degrees	10.00
Miscellaneous Att	dB	0.00
Height of aperture	feet	23.00
Ant HBW	degrees	360.00
Distance to Ant _{base}	feet	92.30
WOST?	Y/N?	n

Ant System NINE Owner: Town
Sector: 1
Azimuth: 360

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfsafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.