

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

October 8, 2002

Christopher B. Fisher, Esq.
Cuddy & Feder & Worby LLP
90 Maple Avenue
White Plains, NY 10601-5196

RE: **EM-AT&T-115-020923** - AT&T Wireless, PCS, Inc., d/b/a AT&T Wireless notice of intent to modify an existing telecommunications facility located at 151 Waterbury Road, Prospect, Connecticut.

Dear Attorney Fisher:

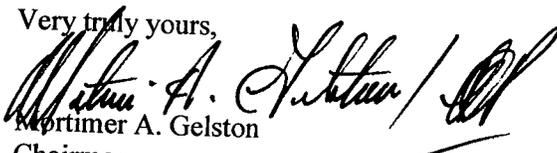
At a public meeting held on October 7, 2002, the Connecticut Siting Council (Council) acknowledged your notice to modify this existing telecommunications facility, pursuant to Section 16-50j-73 of the Regulations of Connecticut State Agencies with the conditions that the bent tower leg on the bottom tower section be reinforced and the guy wires replaced and attached to a new guy anchor at 135' radius per Walker Engineering recommendations and that a professional engineer certify to the Council the successful completion of these improvements.

The proposed modifications are to be implemented as specified here and in your notice received in our office on September 23, 2002. 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,


Mortimer A. Gelston
Chairman

MAG/laf

c: Honorable Robert J. Chatfield, Mayor, Town of Prospect
William J. Donovan, Zoning Enforcement Officer, Town of Prospect
Clear Channel Broadcasting

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**NOTICE OF INTENT TO MODIFY AN
EXISTING TELECOMMUNICATIONS FACILITY
151 WATERBURY ROAD, PROSPECT, CONNECTICUT**

SEP 23 2002
CONNECTICUT
SITING COUNCIL

Pursuant to the Public Utility Environmental Standards Act, Connecticut 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 151 Waterbury Road, Prospect, Connecticut (the "Waterbury Road Facility"), owned by Clear Channel Broadcasting, Inc., ("Clear Channel"). AT&T Wireless and Clear Channel have agreed to share the use of the Waterbury Road Facility, as detailed below.

The Waterbury Road Facility

The Waterbury Road Facility consists of an approximately one hundred ninety-five feet (195) foot guyed tower (the "Tower") and associated equipment currently maintained by Clear Channel. Surrounding land uses include a mix of commercial, industrial and residential uses.

AT&T Wireless' Facility

As shown on the enclosed plans prepared by Natcomm, LLC, including a site plan and tower elevation of the Waterbury 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, three at approximately the 148 level and three at the 140 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 located at the base of the tower with fencing. As evidenced in the structural evaluation prepared by Walker Engineering, Inc., annexed hereto as Exhibit B, AT&T has confirmed that the Tower is structurally capable of supporting the addition of AT&T Wireless' antennas with some minor modifications to a bent tower leg and the existing guy wires and anchors.

AT&T Wireless' Facility Constitutes An Exempt Modification

The proposed addition of AT&T Wireless' antennas and equipment to the Waterbury 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 Report¹ prepared by

¹ All antennas currently on the tower are inactive. See letter from TowerAmerica, management company for Clear Channel, annexed hereto as Exhibit A.

EM-AT&T-115-020923

Prabhakar K. Rughoobur, RF Engineer, annexed hereto as Exhibit C, 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

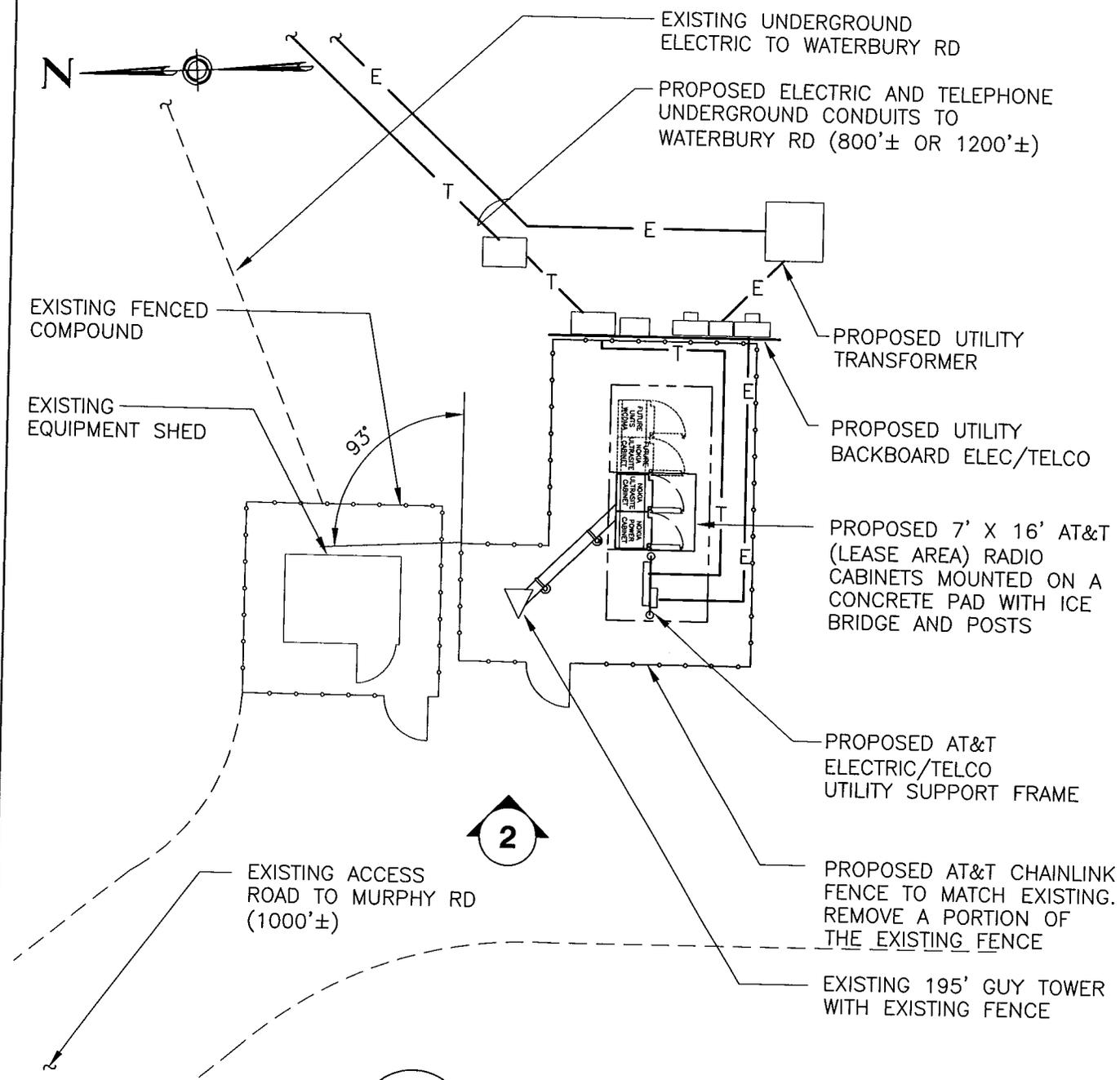
Accordingly, AT&T Wireless requests that the Connecticut Siting Council acknowledge that its proposed modification to the Waterbury Road Facility meets the Council's exemption criteria.

Respectfully Submitted,



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

cc: Mayor, Town of Prospect
RJ Wetzal, Bechtel

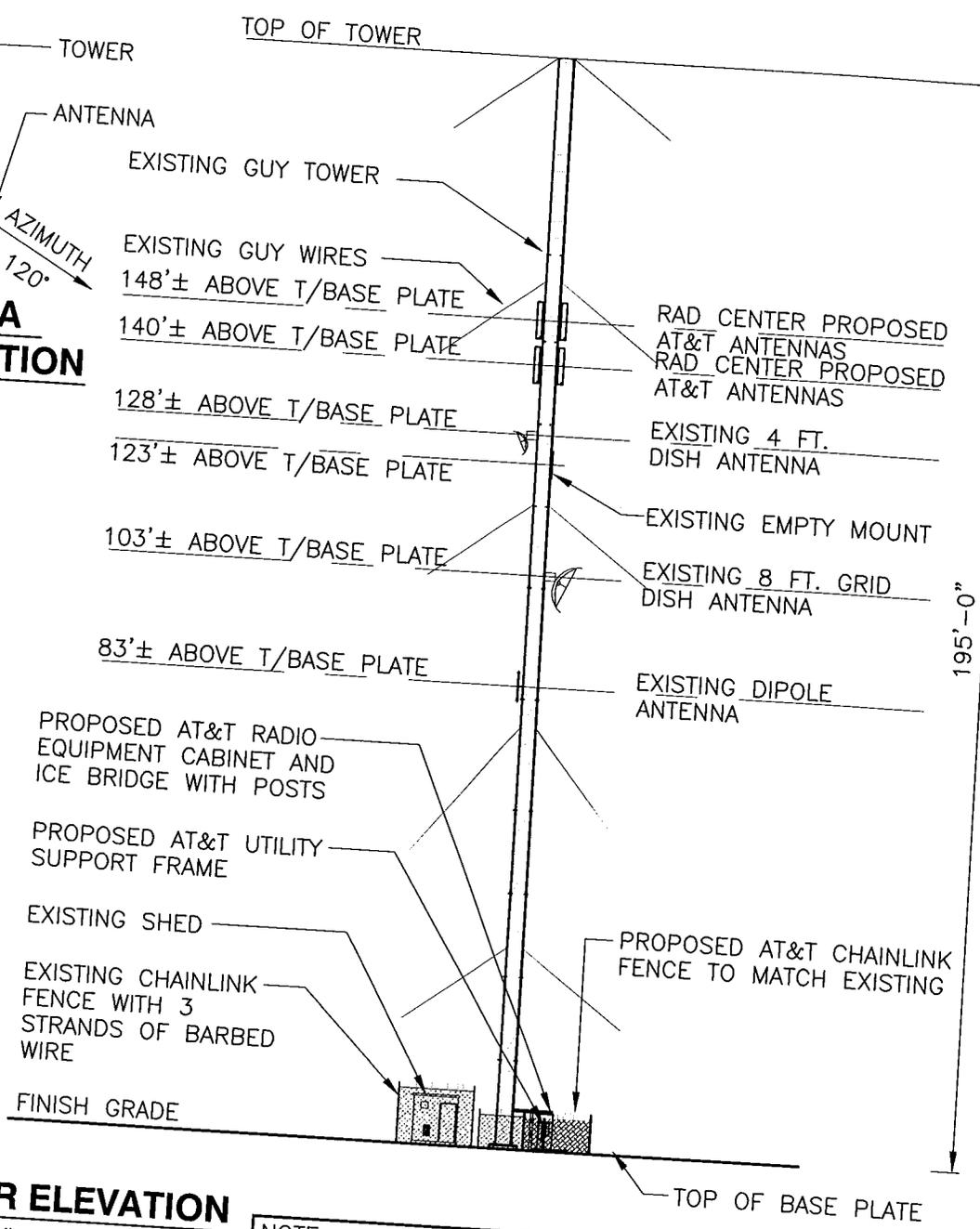
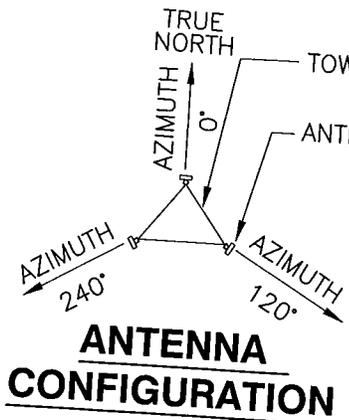


1 **COMPOUND PLAN**
SCALE: 1" = 20'-0"

NOTE:
LATITUDE: 41.5228°
LONGITUDE: 72.9978°

"ISSUED FOR SITING COUNCIL"

 <p>Natcomm, LLC 63-2 North Branford Road Branford, Connecticut 06405 Tel. (203) 488-0580 Fax (203) 488-8587 Consulting Engineers-Project Management Civil-Structural-Mechanical-Electrical</p>	 <p>AT&T WIRELESS PCS LLC 12 OMEGA DRIVE STAMFORD, CONNECTICUT 06907</p>	<p>DRAWING TITLE: SITING COUNCIL</p> <p>PROJECT INFORMATION: PROSPECT CT-626 151 WATERBURY ROAD PROSPECT, CT 06712</p> <p>LESSOR: CLEAR CHANNEL COMM. INC. 151 WATERBURY ROAD PROSPECT, CT 06712</p>	<p style="text-align: right;">DRAWING NO. 913-008-626A-SC1</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="font-size: small;">REVISION NO. 1</td> <td style="font-size: small;">DRAWN BY: CMS</td> </tr> <tr> <td style="font-size: small;">DATE ISSUED: 09/10/02</td> <td style="font-size: small;">CHECKED BY: JJP</td> </tr> <tr> <td style="font-size: small;">SCALE: AS NOTED</td> <td style="font-size: small;">APPROVED BY: CFC</td> </tr> <tr> <td style="font-size: small;">A/E PROJECT NO: 539A</td> <td style="font-size: small;">SHEET NO. 1 OF 2</td> </tr> </table>	REVISION NO. 1	DRAWN BY: CMS	DATE ISSUED: 09/10/02	CHECKED BY: JJP	SCALE: AS NOTED	APPROVED BY: CFC	A/E PROJECT NO: 539A	SHEET NO. 1 OF 2
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DATE ISSUED: 09/10/02	CHECKED BY: JJP										
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A/E PROJECT NO: 539A	SHEET NO. 1 OF 2										



NOTE:
 STRUCTURAL ANALYSIS BY WALKER ENGINEERING, INC.
 OF A 195' GUY TOWER PROSPECT-WATERBURY ROAD,
 151 WATERBURY ROAD, PROSPECT, CT 06712 (CT-626)
 DATED SEPTEMBER 5, 2002 BY JIM WALKER, LICENSE
 NUMBER 21197.

"ISSUED FOR SITING COUNCIL"

Natcomm, LLC
 63-2 North Branford Road
 Branford, Connecticut 06405
 Tel: (203) 488-0580
 Fax: (203) 488-8537
 Consulting Engineers - Project Management
 Civil - Structural - Mechanical - Electrical

AT&T
 AT&T WIRELESS PCS LLC
 12 OMEGA DRIVE
 STAMFORD, CONNECTICUT 06907

DRAWING TITLE:
 SITING COUNCIL

PROJECT INFORMATION:
 PROSPECT
 CT-626
 151 WATERBURY ROAD
 PROSPECT, CT 06712

LESSOR:
 CLEAR CHANNEL COMM. INC.
 151 WATERBURY ROAD
 PROSPECT, CT 06712

DRAWING NO. 913-008-626A-SC2	
REVISION NO. 1	DRAWN BY: CMS
DATE ISSUED: 09/10/02	CHECKED BY: JJP
SCALE: AS NOTED	APPROVED BY: CFC
SHEET NO. 2 OF 2	
A/E PROJECT NO: 539A	

TowerAmerica

3300 University Drive Suite 625 Coral Springs, Florida 33065 Telephone (954) 757-5757 Fax (954) 757-9994
With Offices in Los Angeles and Greensboro

Joanne Desjardins
AT&T Wireless
Bechtel Telecommunications
210 Pomeroy Avenue
Meriden, CT 06450

RE: CSC Filing -ClearChannel Broadcast tower facility at 151 Waterbury Road, Prospect, CT (CT-626)

Dear Joanne:

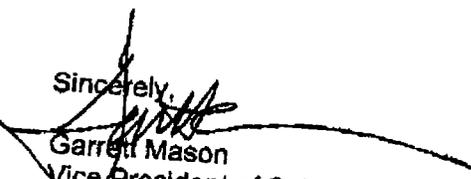
As you requested, this letter is intended for Bechtel's use on behalf of AT&T Wireless for filing with the Connecticut Siting Council and serves to clarify the status of currently installed antennas and cable on the site referenced above.

Please note that all antennas and cabling currently on the tower are inactive and will be removed during AT&T's installation of their system.

Should you have any questions please contact me at the number listed below.

Thank you,

Sincerely,


Garrett Mason
Vice President of Sales & Marketing
TowerAmerica
garrett@toweramerica.com
(office) 954.757.5757
(fax) 954.757.9994

WALKER ENGINEERING, INC.

8451 DUNWOODY PLACE
NORTHRIDGE 400, BLDG. 8
DUNWOODY, GA 30350

(770) 641-7306 FAX (770) 587-2196

CIVIL • STRUCTURAL
N 33° 59' 13.6" W 84° 20' 26.8"

Mr. Jason J. Pintek
Natcomm, LLC
63-2 North Branford Road
Branford, CT 06405

09/05/02
CT- 626
Prospect CT

Sub: Structural Analysis of 195-ft Guy Tower
151 Waterbury Drive, Prospect, CT 06712

Dear Mr. Pintek:

Walker Engineering has performed a Level-Two finite element, P- Δ structural re-analysis of the above noted tower in accordance with your Authorization for Services for the addition of the **AT&T Wireless** proposed antennas outlined below. This analysis consists of determining the forces on the tower caused by existing, proposed, and future loads. The existing, proposed, and future loads were provided by your office.

The subject tower is a 195-ft, three face, guyed-tower, designed and manufactured by Stainless, Inc in 1972. The complete tower manufacturer's drawings are unavailable. A portion of the original Stainless design, Report No.: 2349-1, dated 05/09/73, was provided by your office. The tower data was obtained from the above partial report and a climbing report by CSB Communications, Site Name: Prospect CT, Site No.: CT-626, dated 06/04/02. The Tower Inventory report was provided by your office. The tower geometry and member sizes were obtained from these data and are assumed to be accurate. The tower has also been assumed to be in good condition and capable of supporting its original full design capacity.

Our analysis was performed in accordance with TIA/EIA-222-F for an 85 mph¹ base windload, and 75% of the base windload with 1/2" radial ice, as specified by Natcomm, LLC.

Existing and proposed loads consist of the following:

at 148 ft **AT&T (Future):** Three Allgon 7250.03 panel antennas on three flush mounts, fed by six 1-1/4"Ø coax cables.

¹ The minimum windspeed specified by EIA-222-F for New Haven County, CT is 85 mph.

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BY: 

- at 140 ft **AT&T (Proposed):** Three Allgon 7250.03 panel antennas on three flush mounts, fed by six 1-1/4"Ø coax cables.
- at 137 ft Torque arm assembly.
- at 128 ft Existing: One Andrew 39018-2 4-ft dish antenna fed by one 7/8"Ø coax cable.
- at 123 ft Existing: One empty mount.
- at 103 ft Existing: One P-696GRN Anixer-Mark 8-ft grid dish antenna fed by one 1/2"Ø coax cable.
- at 83 ft Existing: One dipole (broken) antenna fed by one 1/2"Ø coax cable.

Note: Placement of coax cables *is critical*. The coax cables (existing, future, and proposed) *shall* be installed on the tower per Walker Engineering Drawing S-1, Job No. 0206-225, dated 09/05/02. Additional waveguide ladders may be required. *Please notify the undersigned prior to altering the cable routing configuration or if the coax configuration is different than the following chart.* Placement of small cables for beacons, ground rods, etc. are not critical.

<u>Existing:</u>	<u>Proposed/Future:</u>
<u>Face A:</u> 1ea 7/8"Ø to 128' 1ea 1/2"Ø to 103' 2ea 7/8"Ø to 92' 1ea 1/2"Ø to 83'	None
<u>Face B:</u> None	6ea 1-1/4"Ø to 148' (AT&T) (Install per Drawing S-1)
<u>Face C:</u> 1ea 1-5/8"Ø to 159'	6ea 1-1/4"Ø to 140' (AT&T) (Install per Drawing S-1)

Tower Summary:

This analysis shows that the subject tower **is adequate** to support the existing, future, and proposed loads. For this analysis, the bent tower leg on the bottom tower section shall be reinforced per Walker Engineering Drawing S-1, Job No. 0206-225, dated 09/05/02 and the guy wires replaced and attached to a new guy anchor at a radius of 135-ft (see Walker Engineering Drawing's S-1, S-2, and S-3 Job No. 0206-225, dated 09/05/02).

A copy of the full analysis is enclosed. A summary of the controlling load cases is provided below:

<u>Guys</u>	<u>Allowable</u>	<u>Existing/Proposed</u>	<u>% of Allowable</u>
at 187'	5.60 k	4.86 k	87 %
at 137'	5.60 k	5.20 k	93 %
at 87'	5.60 k	5.04 k	90 %
at 37'	5.60 k	2.70 k	48 %

<u>Tower Element</u>	<u>Combined Stress Index²</u>
Legs (Max)	0.56
Bracing (Max)	0.42

Foundation Summary:

The original foundation design drawings and loads are unavailable. Walker Engineering, Inc. has performed a foundation evaluation according to foundation mapping by CSB Communications, Site Name: Prospect CT, Site No.: CT-626, dated 06/04/02, Walker Engineering's new guy anchor design, attached as Walker Job No.: 0206-225, Drawing No.: S-2, dated 09/05/02, and the Geotechnical soils report by Criscuolo Shepard Associates, PC, CSA File No. 2002.906, dated: 08/13/02. The results indicate that the existing tower mast foundation and new guy anchor foundations **are adequate** to support the existing, future, and proposed loads.

<u>Foundation Loads</u>	<u>Design³ Capacity</u>	<u>Existing/Proposed</u>	<u>% of Capacity</u>
Mast (vert.)	48.0 k	38.0 k	79 %
Guy (vert.)	18.1 k	14.0 k	77 %
Anchor (horiz.)	18.9 k	17.1 k	91 %

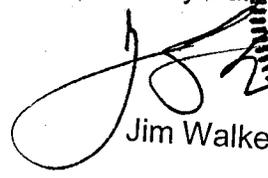
As future loads are installed, the tower should be re-evaluated on a case-by-case basis.

The analysis is based on information provided to this office by Natcomm, LLC. If the existing conditions are different than the information in this report, Walker Engineering should be contacted for resolution of any issues.

² Ratio of calculated loads versus total allowable loads; should be less than, or equal to, 1.00.
³ Mast foundation dimensions from climbing report by CSB Communications, dated 06/04/02 and new guy anchor foundation by Walker Engineering Drawing S-2, Job No. 0206-225, dated 09/05/02. Geotechnical soils report by Criscuolo Shepard Associates, PC, CSA File No. 2002.906, dated: 08/13/02.

Walker Engineering appreciates the opportunity to be of service in this matter.
Please do not hesitate to give me a call if you have any questions or comments.

encl

Very truly yours,

Jim Walker, P.E.





**RF Exposure Analysis for Proposed
AT&T Wireless Antenna Facility**

SITE ID: 913-008-626

June 27, 2002

**Prepared by AT&T Wireless Services, Inc.
Prabhakar K. Rughoobur, 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 151 Waterbury Rd, Prospect, CT 06712. 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: Prospect	
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)	148/140 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 RC (Radiation Center) of antenna, and *EIRP(θ)* = 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 to center of radiation, *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 (μW), a millionth of a watt, per square centimeter (cm²). 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 Radiation

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 0.000232 mW/cm² which occurs at 280 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000070 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 radiation

<i>Frequency</i>	<i>Public/Uncontrolled</i>	<i>Occupational/controlled</i>	<i>Maximum power density at Accessible location</i>
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.000232 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

The maximum power density at the proposed facility represents only 0.02% of the public MPE limit for PCS frequencies.

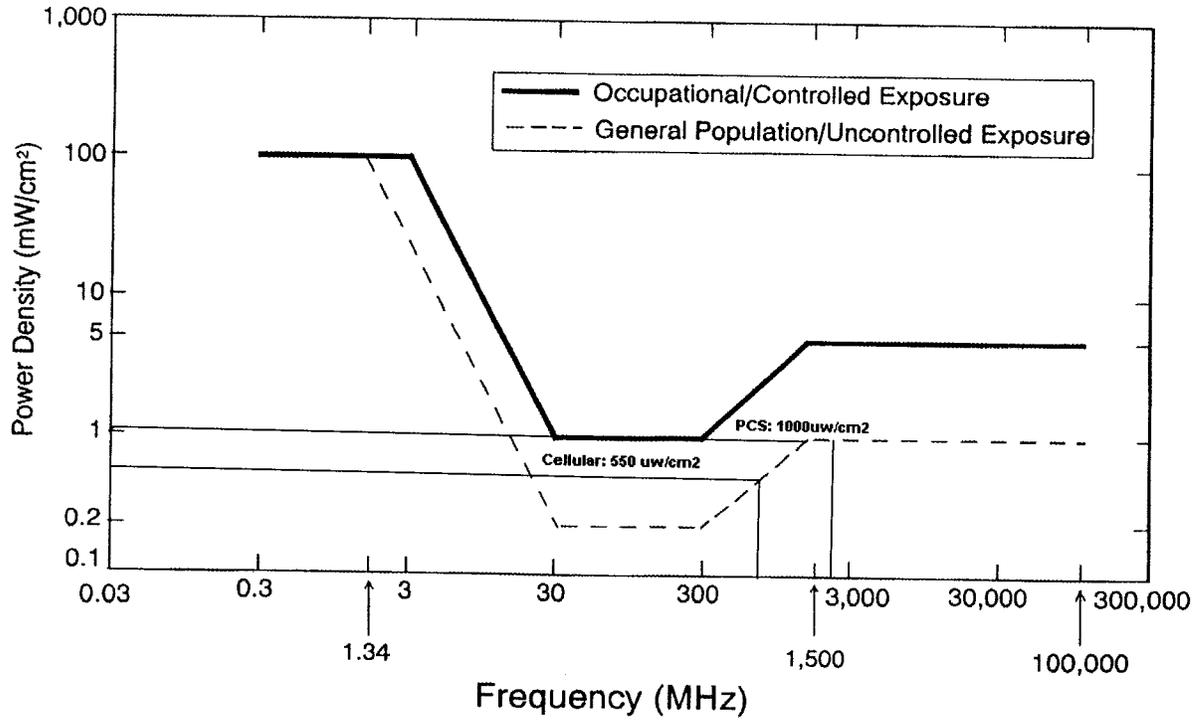
6. Conclusion

This analysis show that the maximum power density in accessible areas at this location is 0.000232 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.”

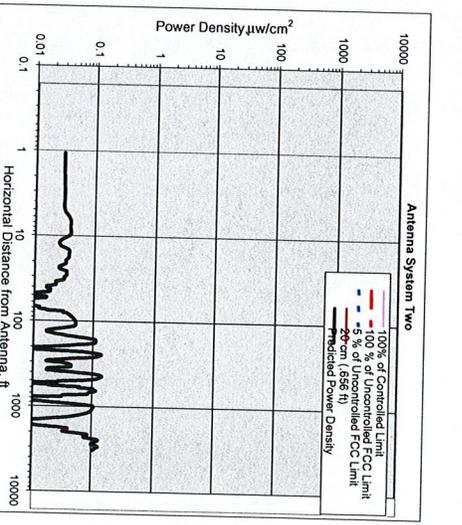
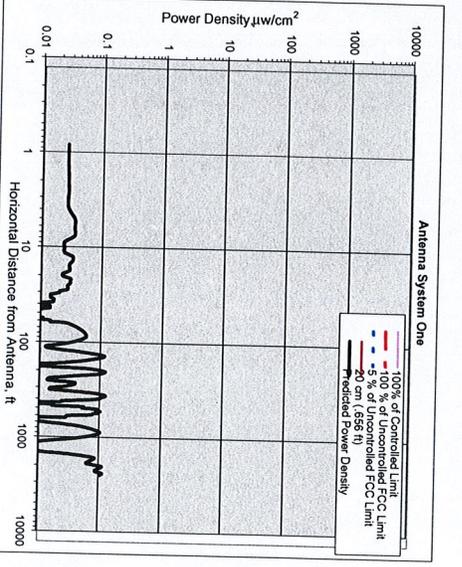
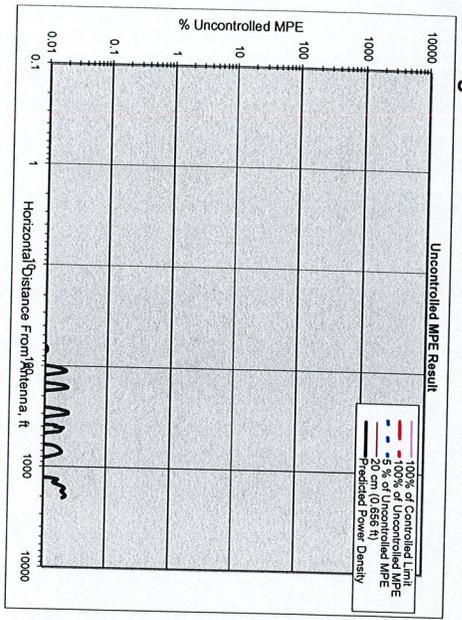
7. FCC Limits for Maximum Permissible Exposure

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



8. Exhibit A

Heading



Number of Antenna Systems: 2
Meets FCC Controlled Limits for The Antennas Systems.

Meets FCC Uncontrolled Limits for The Antenna Systems.

Meets 5% of FCC Uncontrolled Limits for The Antenna Systems.

No Further Maximum Permissible Exposure (MPE) Analysis Required.

Maximum Power Density =	0.000232	Power Density	mW/cm ²	@Hertz Dist.	feet
Composite Power (ERP) =	3.000.00	% of limit	0.02		280.00

Site ID: 913-008-626
Site Name: Prospect
Site Location: 151 Waterbury Road
Prospect, CT 06712
Performed By: Prabhakar Rughnour
Date: 6/27/02

Antenna System One

Parameter	units	Value
Frequency	MHz	1945.00
# of Channels	#	6
Max ERP/Ch	Watts	250.00
Max Pwr/Ch into Ant.	Watts	5.86
(Center of Radiator)	feet	148.00
Calculation Point	feet	0.00
(above ground or roof surface)		0.00
Antenna Model No.		Aligon 7250.03
Max Ant Gain	dBd	16.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.11
Ant HBW	degrees	65.00
Distance to Antenna	feet	145.45
WOS? Y/N?		n

Ant System ONE Owner: AT&T
Sector: 3
Azimuth: 01/20/240

Antenna System Two

Parameter	units	Value
Frequency	MHz	1945.00
# of Channels	#	6
Max ERP/Ch	Watts	250.00
Max Pwr/Ch into Ant.	Watts	5.86
(Center of Radiator)	feet	140.00
Calculation Point	feet	0.00
(above ground or roof surface)		0.00
Antenna Model No.		Aligon 7250.03
Max Ant Gain	dBd	16.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.11
Ant HBW	degrees	65.00
Distance to Antenna	feet	137.45
WOS? Y/N?		n

Ant System TWO Owner: AT&T
Sector: 3
Azimuth: 01/20/240

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.