



C Squared Systems, LLC
65 Dartmouth Drive
Auburn, NH 03032
(603) 644-2800

support@csquaredsystems.com

Calculated Radio Frequency Emissions Report



Pownal VT

RTT2-01

127 Crow Hill Road, Pownal, VT 05261

November 22, 2024

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1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the proposed installation of AT&T's antenna arrays to be mounted at 186' AGL on a proposed lattice tower located at 127 Crow Hill Road, Pownal, VT. The coordinates¹ of the proposed facility are 42° 45' 26.15" N, 73° 15' 31.79" W.

AT&T is proposing to install a two sector array of multi-band antennas mounted at a centerline of 186' AGL (above ground level) to support its commercial and FirstNet 4G LTE networks.

This report considers the antenna configuration for AT&T's proposed installation to calculate the resulting % Maximum Permissible Exposure (MPE) at ground level around the proposed facility.

2. FCC Guidelines for Evaluating RF Radiation Exposure Limits

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 OET Bulletin 65 Edition 97-01. These new rules include Maximum Permissible Exposure (MPE) limits for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based upon those recommended by the National Council on Radiation Protection and Measurements (NCRP), developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

The FCC general population/uncontrolled limits set the maximum exposure to which most people may be subjected. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

Public exposure to radio frequencies is regulated and enforced in units of milliwatts per square centimeter (mW/cm²). The general population exposure limits for the various frequency ranges are defined in the documents referenced in Attachment A of this report.

Higher exposure limits are permitted under the occupational/controlled exposure category, but only for persons who are exposed as a consequence of their employment and who have been made fully aware of the potential for exposure, and they must be able to exercise control over their exposure. General population/uncontrolled limits are five times more stringent than the levels that are acceptable for occupational, or radio frequency trained individuals. Attachment B of this report contains excerpts from OET Bulletin 65 and presents the Maximum Exposure Limit.

Finally, it should be noted that the MPE limits adopted by the FCC for both general population/uncontrolled exposure and for occupational/controlled exposure incorporate a substantial margin of safety and have been established to be well below levels generally accepted as having the potential to cause adverse health effects.

¹ As defined in the Rising Tide Tower II Construction Drawings prepared by Dewberry Engineers Inc dated 11/14/2024 (Rev. A).

3. RF Exposure Calculation Methods

The results displayed in the following figures were generated using the following formula as outlined in FCC bulletin OET 65:

$$\text{Power Density} = \left(\frac{GRF^2 \times \text{EIRP}}{4\pi \times R^2} \right) \times \text{Off Beam Loss}$$

Where:

EIRP = Effective Isotropic Radiated Power

R = Radial Distance = $\sqrt{H^2 + V^2}$

H = Horizontal Distance from antenna

V = Vertical Distance from radiation center of antenna

Off Beam Loss is determined by the selected antenna patterns

GRF = Ground reflection factor of 2.0

These calculations assume that the antennas are operating at full power and 100 percent capacity, and that all antenna channels are transmitting simultaneously. Obstructions (trees, buildings, etc.) that would normally attenuate the signal are not considered. The calculations assume even terrain in the area of study and do not account for actual terrain elevations which could attenuate the signal. As a result, the calculated power density and corresponding % MPE levels reported below are much higher than the actual signal levels will be from the final installation.

The percent of MPE values presented in this report reflect levels that one may encounter from one sector of a carrier’s antennas. Most carriers use 3 or 4 sectors per site with azimuths approximately 90 or 120 degrees apart, respectively; therefore, one could not be standing in the main beam of all sectors at the same time. In cases where antenna models are not uniform across all sectors, the antenna model with the highest gain was used for the calculations. This results in a conservative or “worst case” assumption for percent of MPE calculations.

4. Antenna Inventory

Table 1 below outlines AT&T’s proposed antenna configuration for the site. The associated antenna model data and antenna patterns for these specific antenna models are included in Attachment C.

| Operator | Sector / Azimuth | TX Freq (MHz) | Power at Antenna (Watts) | Ant Gain (dBi) | Power EIRP (Watts) | Antenna Model | Beam Width | Mech. Tilt | Length (ft) | Antenna Centerline Height (ft) |
|----------|------------------|---------------|--------------------------|----------------|--------------------|---------------|------------|------------|-------------|--------------------------------|
| AT&T | Alpha / 25° | 700 | 160 | 15.6 | 5809 | TPA65R-BU8D | 74 | 0 | 8 | 186 |
| | | 850 | 160 | 16.6 | 7313 | | 63 | 0 | | |
| | Beta / 110° | 700 | 160 | 15.2 | 5298 | TPA45R-KU8A | 51 | 0 | 8.2 | 186 |
| | | 850 | 160 | 15.8 | 6083 | | 49 | 0 | | |

Table 1: Proposed Antenna Inventory^{2 3}

² Antenna configuration is in reference to AT&T’s RF Configuration provided by Wireless Partners LLC and Rising Tide Tower II.

³ Transmit power assumes 0 dB of cable loss.

5. Calculated % MPE Results

The calculated % MPE results for the proposed antenna configuration are shown in Figure 1 below. Each frequency band and technology is calculated as well as the resulting cumulative percent of MPE. For completeness, the calculations for this analysis range from 0 feet horizontal distance (directly below the antennas) to a value of 3,000 feet horizontal distance from the site. In addition to the other worst-case scenario considerations that were previously mentioned, the power density calculations to each horizontal distance point away from the antennas was completed using a local maximum off beam antenna gain (within ± 5 degrees of the true mathematical angle) to incorporate a realistic worst-case scenario.

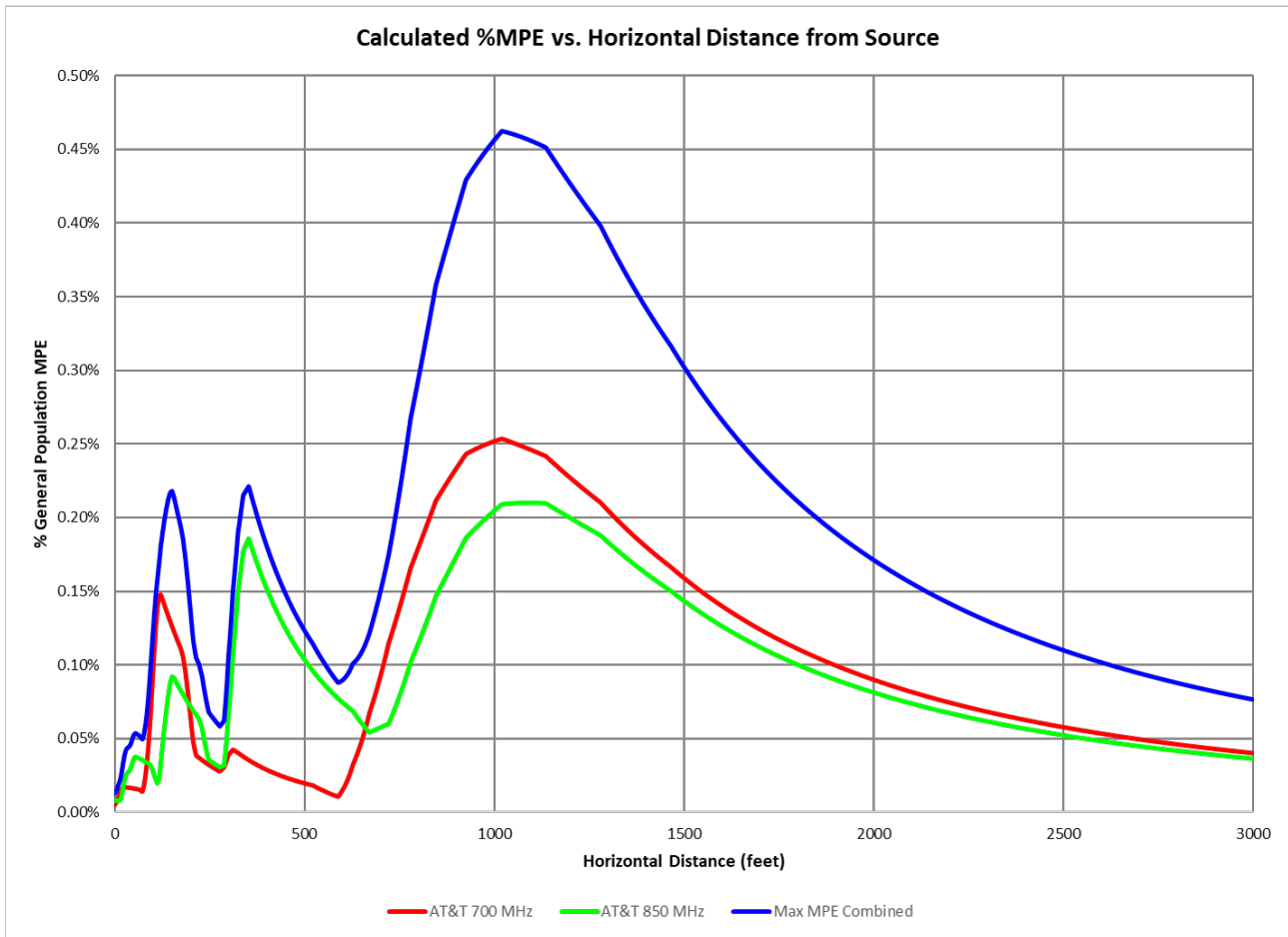


Figure 1: Graph of General Population % MPE vs. Distance

The highest percent of MPE (**0.46%** of the General Population limit) is calculated to occur at a horizontal distance of 1021 feet from antennas. Please note that the percent of MPE calculations close to the site consider off beam loss, which is determined from the vertical pattern of the antennas used. Therefore, RF power density levels may increase as the distance from the site increases. At distances of approximately 1200 feet and beyond, one would now be in the main beam of the antenna patterns and off beam loss is no longer considered. Beyond this point, power density levels vary solely based on distance from the site and the percent of MPE decreases significantly as distance from the site increases.

Table 2 below lists percent of MPE values as well as the associated parameters that were included in the calculations. As stated in Section 3, all calculations assume that the antennas are operating at 100 percent capacity, and that all antenna channels are transmitting simultaneously. Obstructions (trees, buildings etc.) that would normally attenuate the signal are not taken into account. Additionally, a six-foot height offset was considered in this analysis to account for average human height standing at ground level. As a result, the calculated % MPE levels are significantly higher than the actual signal levels will be from the final installation. The results presented in Figure 1 and Table 2 assume level ground elevation from the base of the site out to the horizontal distances calculated.

| Carrier | Number of Transmitters | Power out of Base Station Per Transmitter (Watts) | Antenna Height (Feet) | Distance to the Base of Antennas (Feet) | Power Density (mW/cm ²) | Limit (mW/cm ²) | % MPE |
|--------------|------------------------|---|-----------------------|---|-------------------------------------|-----------------------------|--------------|
| AT&T 700 MHz | 1 | 160.0 | 186.0 | 1021 | 0.001267 | 0.500 | 0.25% |
| AT&T 850 MHz | 1 | 160.0 | 186.0 | 1021 | 0.001185 | 0.567 | 0.21% |
| | | | | | | Total | 0.46% |

Table 2: Maximum Percent of General Population Exposure Values ^{4 5}

⁴ Frequencies listed are representative of the operating band and are not the specific operating frequency.

⁵ The total % MPE listed is a summation of each unrounded contribution. Therefore, summing each rounded value may not reflect the total value listed in the table.

6. Conclusion

The above analysis concludes that RF exposure levels from the proposed site will be well below the maximum permissible levels as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Using the conservative calculation methods and parameters detailed above, the maximum cumulative percent of MPE in consideration of all transmitters is calculated to be **0.46% of the FCC limit (General Population/Uncontrolled)**. This maximum cumulative percent of MPE value is calculated to occur 1021 feet away from the site.

7. Statement of Certification

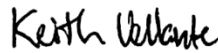
I certify to the best of my knowledge that the statements in this report are true and accurate. The calculations follow guidelines set forth in ANSI/IEEE Std. C95.1, ANSI/IEEE Std. C95.3, and FCC OET Bulletin 65 Edition 97-01.



Report Prepared By: Ram Acharya
RF Engineer
C Squared Systems, LLC

November 21, 2024

Date



Reviewed/Approved By: Keith Vellante
Director – RF Services
C Squared Systems, LLC

November 22, 2024

Date

Attachment A: References

OET Bulletin 65 - Edition 97-01 - August 1997 Federal Communications Commission Office of Engineering & Technology

IEEE C95.1-2019, IEEE Standard Safety Levels With Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz IEEE-SA Standards Board

IEEE C95.3-2021, IEEE Recommended Practice for Measurements and Computations of Electric, Magnetic, and Electromagnetic Fields With Respect to Human Exposure to Such Fields, 0 Hz to 300 GHz IEEE-SA Standards Board

Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)

(A) Limits for Occupational/Controlled Exposure⁶

| Frequency Range (MHz) | Electric Field Strength (E) (V/m) | Magnetic Field Strength (E) (A/m) | Power Density (S) (mW/cm ²) | Averaging Time E ² , H ² or S (minutes) |
|-----------------------|-----------------------------------|-----------------------------------|---|---|
| 0.3-3.0 | 614 | 1.63 | (100)* | 6 |
| 3.0-30 | 1842/f | 4.89/f | (900/f ²)* | 6 |
| 30-300 | 61.4 | 0.163 | 1.0 | 6 |
| 300-1500 | - | - | f/300 | 6 |
| 1500-100,000 | - | - | 5 | 6 |

(B) Limits for General Population/Uncontrolled Exposure⁷

| Frequency Range (MHz) | Electric Field Strength (E) (V/m) | Magnetic Field Strength (E) (A/m) | Power Density (S) (mW/cm ²) | Averaging Time E ² , H ² or S (minutes) |
|-----------------------|-----------------------------------|-----------------------------------|---|---|
| 0.3-1.34 | 614 | 1.63 | (100)* | 30 |
| 1.34-30 | 824/f | 2.19/f | (180/f ²)* | 30 |
| 30-300 | 27.5 | 0.073 | 0.2 | 30 |
| 300-1500 | - | - | f/1500 | 30 |
| 1500-100,000 | - | - | 1.0 | 30 |

f = frequency in MHz * Plane-wave equivalent power density

Table 3: FCC Limits for Maximum Permissible Exposure

⁶ Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

⁷ General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

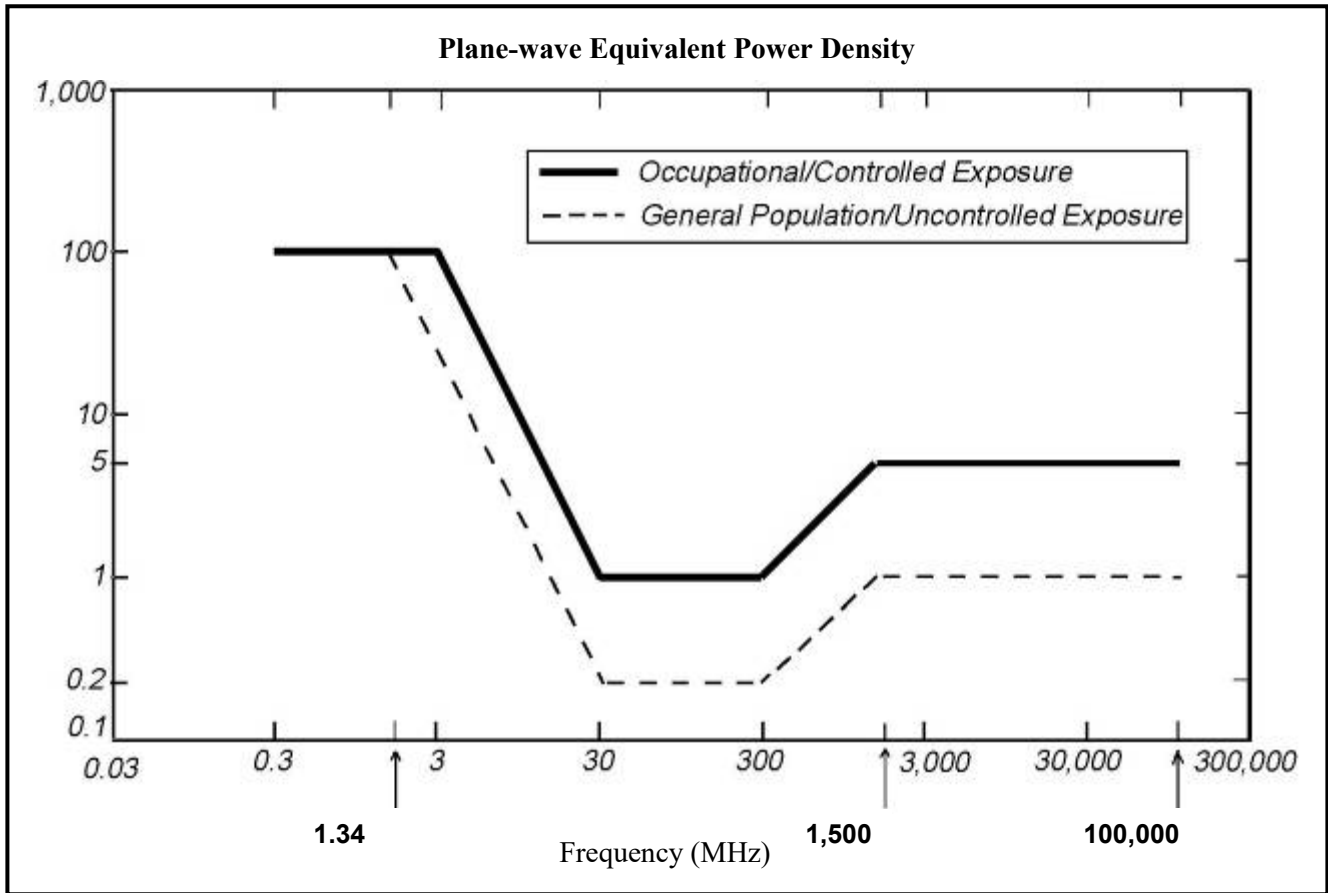
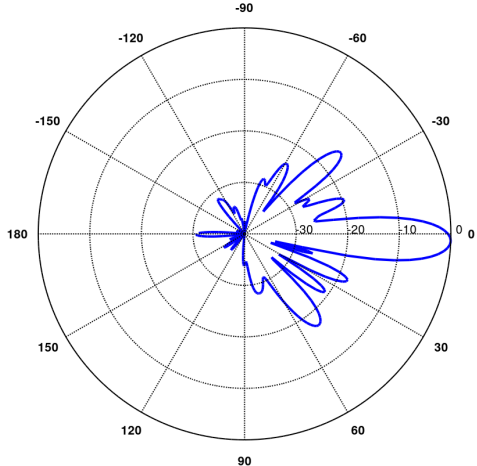
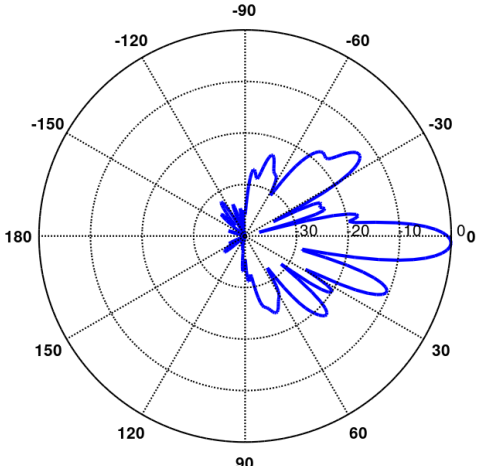


Figure 2: Graph of FCC Limits for Maximum Permissible Exposure (MPE)

Attachment C: AT&T Antenna Model Data and Electrical Patterns

| | |
|--|---|
| <p>700 MHz</p> <p>Manufacturer: CCI Model #: TPA65R-BU8D Frequency Band: 698-806 MHz Gain: 15.6 dBi Electrical Down-Tilt: 2° Vertical Beamwidth: 9.5° Horizontal Beamwidth: 74° Polarization: ±45° Dimensions (L x W x D): 96" x 20.7" x 7.7"</p> |  |
| <p>850 MHz</p> <p>Manufacturer: CCI Model #: TPA65R-BU8D Frequency Band: 824 - 896 MHz Gain: 16.6 dBi Electrical Down-Tilt: 2° Vertical Beamwidth: 8° Horizontal Beamwidth: 63° Polarization: ±45° Dimensions (L x W x D): 96" x 20.7" x 7.7"</p> |  |