

PLANNING COMMISSION MEETING RICHFIELD MUNICIPAL CENTER, COUNCIL CHAMBERS JULY 22, 2019 7:00 PM

Call to Order

Approval of minutes of the regular Planning Commission meeting of April 22, 2019.

Opportunity for Citizens to Address the Commission on items not on the Agenda

Agenda Approval

1. Approval of the Agenda

Public Hearings

2. Public hearing to consider a request for variances to allow the addition of an attached garage at 2015 Forest Drive.

19-VAR-04

3. Public hearing to consider a request for conditional use permits to allow small wireless facilities at multiple locations throughout the City.

19-CUP-03, 19-CUP-04, 19-CUP-05, 19-CUP-06, 19-CUP-07, 19-CUP-08, 19-CUP-09

Liaison Reports

Community Services Advisory Commission City Council Housing and Redevelopment Authority (HRA) Richfield School Board Transportation Commission Chamber of Commerce Other

City Planner's Reports

- 4. City Planner's Report
- 5. Next Meeting Time and Location
 - Monday, August 26, 2019, at 7:00 p.m. in the Council Chambers
- 6. Adjournment

Auxiliary aids for individuals with disabilities are available upon request. Requests must be made at least 96 hours in advance to the City Clerk at 612-861-9738.



Planning Commission Minutes

May 29, 2019

4	
MEMBERS PRESENT:	Chairperson Allysen Hoberg, Commissioners Bryan Pynn, Susan Rosenberg, Peter Lavin, James Rudolph, and Kathryn Quam
MEMBERS ABSENT:	Commissioner Sean Hayford Oleary
STAFF PRESENT:	Matt Brillhart, Associate Planner Sadie Gannett, Assistant Planner
OTHERS PRESENT:	Applicant, Veronica Bradbury, 7120 Chicago Ave (Reggae Foods) Applicant, Keith Koenig, 7132 Portland Ave (Hope Church) See attached sign-in sheet for additional speakers

Chairperson Hoberg called the meeting to order at 7:00 p.m.

APPROVAL OF MINUTES

M/Rosenberg, S/Pynn to approve the minutes of the April 22, 2018 meeting. *Motion carried: 6-0*

OPEN FORUM

No members of the public spoke.

ITEM #1 APPROVAL OF AGENDA

M/Rosenberg, S/Pynn to approve the agenda. *Motion carried: 6-0*

PUBLIC HEARING(S)

ITEM #2

19-CUP-02 – Consideration of a request for a conditional uses permit for a restaurant at 7120 Chicago Avenue S.

Assistant Planner Sadie Gannett presented the staff report.

In response to James Swanson, 7108 Chicago, applicant Veronica Bradbury stated that the hours of operation will be 12:00-8:00 pm.

Gannett clarified the landscaping responsibilities for Commissioner Lavin.

M/Pynn, S/Rosenberg to close the public hearing. *Motion carried: 6-0*

Commissioner Pynn and Chair Hoberg expressed excitement and support for the proposal.

M/Rudolph, S/Rosenberg to recommend approval of the conditional use permit for a restaurant at 7120 Chicago Avenue S. *Motion carried: 6-0*

ITEM #3

19-CUP-01 – Consideration of a request for a conditional use permit to allow a school at 7132 Portland Avenue S.

Assistant Planner Sadie Gannett presented the staff report.

May 29, 2019

Patrick, Clinton Avenue, expressed concerns with security, over-crowding, and traffic. Julia Maunder, 7108 4th Ave, expressed concerns with increased traffic and classroom size.

M/Rosenberg, S/Rudolph to close the public hearing. *Motion carried: 6-0*

Commissioner Lavin acknowledged the traffic concerns but stated that the building has historically been used as a school, which is conditionally permitted. Commissioner Pynn concurred and stated that the concerns raised should be worked out, but are not necessarily land use considerations. Commissioner Rosenberg agreed and expressed support.

Leadriane Roby, Assistant Superintendent for Richfield Public Schools, addressed the concerns raised about the RCEP program. Keith Koenig, Director of Facilities for Hope Church, further addressed the concerns raised and explained what went into accommodating the various programs using space at Hope Church.

Koenig clarified that the CUP for the preschool allowed drop-offs on 4th Avenue.

Chair Hoberg raised concerns around inclusion and Hope Church's position against gay marriage and stated that this issue should be brought before the school board.

Brillhart clarified for Chair Hoberg the legal obligations of the Planning Commission.

M/Pynn, S/Rosenberg to recommend approval of a conditional use permit to allow a school at 7132 Portland Avenue S.

Commissioner Quam expressed support for relocating the drop off to Portland Avenue.

Commissioner Pynn acknowledged concerns but clarified the criteria for a conditional use permit and encouraged additional issues to be worked out between the church and residents.

Motion carried: 5-1 (Hoberg against)

ITEM #4

Public Hearing to consider amending a Final Development Plan for a Planned Unit Development at 6540 Penn Avenue (CVS).

Associate Planner Matt Brillhart presented the staff report

Luci Peterson at 2500 W 66th St requested updates on the NOVO project for Fraser residents.

Commissioner Rudolph expressed support for Peterson's requests and stated that the developer needs to have good communication with the neighborhood in order to be successful.

Todd Olin, applicant, expressed support for community engagement and stated that this is something that they routinely do. In response to Commissioner Pynn, Olin gave a brief update and stated that there haven't been any notifications due to the lag time for the project to begin.

Olin also stated that they have been communicating with the owner of Fraser and was not aware that the updates were not getting passed on to the residents.

May 29, 2019

M/Rudolph, S/Pynn to close the public hearing. *Motion carried: 6-0*

M/Pynn, S/Rudolph to recommend approval of amending a Final Development Plan for a Planned Unit Development at 6540 Penn Avenue (CVS). *Motion carried: 6-0*

In response to Commissioner Pynn and Commissioner Quam, Olin clarified the timeline for preconstruction surveys of nearby houses and the anticipated groundbreaking of September.

LIAISON REPORTS

Community Services Advisory Commission: Commissioner Pynn gave an update on the dog park, recycling, and the boardwalk at Wood Lake Nature Center.

City Council: Commissioner Rosenberg noted the bandshell's opening.

HRA: Commissioner Quam gave an update about the public hearing for the affordable housing site. Richfield School Board: No report.

Transportation Commission: No report.

Chamber of Commerce: No report.

CITY PLANNER'S REPORT

Brillhart noted the time and location for the neighborhood meeting for the Chamberlain project as well as the open house for the Southdale Library.

ADJOURNMENT

M/Rudolph, S/Rosenberg to adjourn the meeting. The meeting was adjourned by unanimous consent at **8:10 p.m.** *Motion carried: 6-0*

Planning Commission Secretary

Speaker's Register

City Council Meeting

Please <u>CLEARLY PRINT</u> your name and address. Thank you.

Name	Address		
Veronica Bradbury	2809 Park Are Apt 201		
Petra Founday	MIPE MO EYOT		
	- 755 CIETO		
gilig Manda	7108 4 Ave S		
Karth Koema	7114 50h Ave 5 Richfield		
Leadriane Bob of	7001 Harriet Ave S. Bidsheld		
hasya with	7001 Haviet Aver & Richtreld,		
MCI Reterson	2500 W 66TH ST. #308		
TODO O in Boyart & Pederson	13076 1st St. Beller, MN		
(6.)			

Sadie Gannett

To: Subject: Matt Brillhart RE: FYI

------ Forwarded message ------From: **Anne Flake** <<u>anneflake77@gmail.com</u>> Date: Wed, May 29, 2019, 6:31 PM Subject: To: <<u>allysenbird@gmail.com</u>>

Dear Allysen,

I'm writing to you in the hopes that you are able to convey some concerns I have regarding Hope Church and the proposed zoning change to the commission. To be entirely fair, I do not have all the details regarding why this zoning change is being proposed, or what the plan is for how this space can be used by our public schools. I recognize that this might all be entirely good for Richfield and our students. Unfortunately, it is difficult to know what to think when so little information has been shared.

As a member of a minority religion, I have deep concerns about any time we muddy the waters by inviting religion into our public schools. Even if there is no religious instruction occurring, the very fact that public school classes would be offered in a religious space is something I'm not entirely comfortable with.

In addition, as the mother of a child who identifies as queer and non-binary, the Hope Church stance that the only acceptable romantic relationship is between a man and a woman, is not only at odds with what I believe, but is also at odds with the goal of our community and our schools to be a welcoming space for every student. I would never argue against Hope Church's right to believe as they do, and in fact, I would argue strongly for their religious liberty (as much as I might disagree with it). But once we start putting school children in their church, their beliefs become relevant to the discussion.

I don't necessarily disagree with the proposal to re-zone Hope Church, but I am concerned about the lack of information and transparency at this point in the process. I believe that we, the citizens of Richfield and parents of Richfield school students, should know why this is happening and what the plan is before considering whether

Thank you so much for your time.

Anne Flake (Mother to six Richfield students and member of the Community Services Commission)

AGENDA SECTION: AGENDA ITEM # CASE NO .:

Public Hearings 19-VAR-04

2.



PLANNING COMMISSION MEETING 7/22/2019

REPORT PREPARED BY: Sadie Gannett, Assistant Planner

CITYPLANNER REVIEW: Melissa Poehlman, Asst. Community Development Director 7/16/2019

ITEM FOR COMMISSION CONSIDERATION:

Public hearing to consider a request for variances to allow the addition of an attached garage at 2015 Forest Drive.

EXECUTIVE SUMMARY:

The property located at 2015 Forest Drive is in the Low-Density Single-Family Residential (R-1) Zoning District. The applicant is proposing to construct an addition that includes a two-car garage and second-story living space. The proposal requires variances from the side setback requirement, the total number of allowable accessory storage buildings, and the total allowable square footage for accessory and garage space.

The applicant is proposing a two-car garage that would be approximately 25 feet wide and 852 square feet in area. The garage also includes living space above and is part of a larger home remodel. Single-family homes in the R-1 District are required to be setback 10 feet from the side lot line. The applicant is requesting a variance to allow a setback of 6.8 feet on the rear corner of the garage and 8.1 feet on the front corner. The layout of the property presents some challenges for adding an attached garage while meeting setback and accessory structure requirements in this district. The house was built with a detached garage at the rear of the property, requiring the house to be located more centrally on the lot to accommodate the driveway. For comparison, the proposed setback of 6.8 feet exceeds the five foot setback requirement of the Single-Family Residential (R) District, which is the predominant zoning residential district in the City. Additionally, there are multiple properties in the vicinity that are also zoned R-1 but do not meet the 10 foot setback requirement.

The homeowners also propose to convert the existing detached garage to an accessory storage building. while maintaining the existing storage buildings on the lot. Code allows for no more than one detached garage, greenhouse, storage building or gazebo. Converting the detached garage to a storage building would create three storage buildings on the lot. The proposed garage addition also increases the net square footage of all accessory structures to 1,616 square feet. Code limits accessory structures to an aggregate of 1,300 square feet. Code does allow lots that are 15,000 square feet or more to have accessory structures make up 13% of the lot area. This lot falls just short of that threshold at 14,673 square feet. If the 13% rule was applied to this lot, it would allow accessory structures to total approximately 1,900 square feet, which is more than the proposed 1,616 square feet. It is reasonable to allow the homeowner to maintain the existing structures while also adding an attached garage.

Staff finds the orientation of the house on the lot and the existing accessory structures to be unique circumstances that warrant granting the variances. Additionally, the attached garage matches the architecture of the surrounding homes and the existing driveway will be removed, which will reduce their impervious surface coverage. Finding that the proposal meets all requirements necessary to issue a variance, staff is

recommending approval.

RECOMMENDED ACTION:

Conduct and close a public hearing and by motion: Approve a resolution granting variances to allow an attached garage with a sideyard setback of 6.8 feet, three accessory storage buildings, and an accessory building aggregate of 1,616 square feet in area at 2015 Forest Drive.

BASIS OF RECOMMENDATION:

A. HISTORICAL CONTEXT

None.

B. POLICIES (resolutions, ordinances, regulations, statutes, etc):

2015 Forest Drive is zoned Low-Density Single-Family Residential (R-1). Accessory building and use requirements are established in Zoning Code Subsection 518.05 and building setback and height requirements are established in Zoning Code Subsection 518.13. The applicant is requesting variances from Subsections 518.05, Subdivision 2 and Subdivision 3, for the aggregate square footage of accessory buildings and the number of storage buildings, and 518.13, Subdivision 2 for the interior side yard building setback, as described above in the executive summary.

A full discussion of general site plan requirements and additional information related to the requested variances and required findings is attached to this report.

C. CRITICAL TIMING ISSUES:

60-DAY RULE: The 60-day clock 'started' when a complete application was received on June 8, 2019. A decision is required by August 7, 2019 or the Council must notify the applicant that it is extending the deadline (up to a maximum of 60 additional days or 120 days total) for issuing a decision.

D. FINANCIAL IMPACT:

None.

E. LEGAL CONSIDERATION:

Notice of this public hearing was published in the *Sun Current* newspaper and mailed to properties within 350 feet of the site on July 11, 2019.

ALTERNATIVE RECOMMENDATION(S):

Deny the request with a finding that the proposed variances do not meet requirements.

PRINCIPAL PARTIES EXPECTED AT MEETING:

Robbie Hyland, applicant

ATTACHMENTS:

	Description	Туре
D	Resolution	Resolution Letter
D	Required Findings	Backup Material
D	Survey	Backup Material
D	Site Plan	Backup Material
D	Site Photos	Backup Material
D	Zoning Map	Backup Material
D	Letter of Support	Backup Material

RESOLUTION OF THE RICHFIELD PLANNING COMMISSION GRANTING APPROVAL OF VARIANCES AT 2015 FOREST DRIVE

WHEREAS, an application has been filed with the City of Richfield which requests approval of variances on the parcel of land commonly known as 2015 Forest Drive (the "property") and legally described as:

Lot 4, Block 9, Fairwood Park, Hennepin County, Minnesota

WHEREAS, the Planning Commission of the City of Richfield held a public hearing and recommended approval of the requested variances at its July 22, 2019 meeting; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and

WHEREAS, Subsection 518.05, Subdivision 2 states that no more than one storage building is permitted in the R-1 District; and

WHEREAS, Subsection 518.05, Subdivision 3 states that the aggregate square footage of private garages and accessory buildings cannot exceed 1300 square feet in gross floor area in the R-1 District; and

WHEREAS, Subsection 518.13, Subdivision 2 states that the interior side setback of a single-family building is 10 feet; and

WHEREAS, Minnesota Statutes Section 462.357, Subdivision 6, provides for the granting of variances to the literal provisions of the zoning regulations in instances where their enforcement would cause "practical difficulty" to the owners of the Property under consideration; and

WHEREAS, based on the findings below, the Richfield Planning Commission approves the requested variances from Richfield City Code Subsection 518.05, Subdivision 3, and Subsection 518.13, Subdivision 2; and

WHEREAS, the City has fully considered the request for approval for the variances; and

NOW, THEREFORE, BE IT RESOLVED, by the Planning Commission of the City of Richfield, Minnesota, as follows:

1. The Planning Commission makes the following general findings:

- a. The Property is zoned Low-Density Single Family Residential (R-1).
- b. The proposed attached garage will be 6.8 feet from the interior side lot line, the aggregate square footage of all accessory buildings will be 1,616 square feet in area and there will be a total of three storage buildings. Variances from Subsection 518.05, Subd. 2 and Subd. 3, and Subsection 518.13, Subd. 2 are required.
- 2. With respect to the application for variances from the above-listed requirements, the Planning Commission makes the following findings:
 - a. Strict enforcement of the Zoning Code subsections listed above would cause a practical difficulty by limiting the property owner's ability to construct an attached two-car garage, which is permitted in this district, while also maintaining the existing structures on the lot.
 - b. The layout of the lot and the size of the existing accessory structures restricts the size and location of an attached garage that could be constructed. The orientation of the house relative to the lot lines does not allow enough space to construct an attached two-car garage and meet setback requirements. Additionally, the combined square footage of the existing accessory structures would limit the size of garage that could be constructed. There are other properties in the same zone or vicinity that have attached two-car garages of a similar size and style and some appear to not meet side setback requirements.
 - c. Granting the requested variance will not alter the essential character of the neighborhood. Granting a variance to allow an attached two-car garage while permitting the existing accessory structures to remain will not alter the character of the neighborhood.
 - d. The variances requested are the minimum necessary to allow a functional two-car garage for the applicant's needs, while also allowing them to retain their existing accessory structures. The proposed 25 foot by 29 foot garage is not unusually large.
 - e. The variances are in harmony with the general purpose and intent of the ordinance and consistent with the Comprehensive Plan. The proposed attached garage and existing accessory structures will not adversely impact the aesthetics of the community or its health, safety and welfare and are consistent with the general purposes and intents of the Zoning Ordinance and Comprehensive Plan.
- 3. Based upon the above findings, variances to the above-specified requirements are hereby approved according to the terms of Richfield City Code Subsection 518.05, Subd. 2 and Subd. 3, and Subsection 518.13, Subd. 2 with the following stipulations:
 - a) The existing driveway and curb cut as shown on the survey dated 7/3/2019 are required to be removed and landscaped prior to final building inspection and issuance of a certificate of occupancy.
 - b) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - c) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - d) Prior to final building inspection approval, the applicant must submit a surety equal to 125% of the value of any improvements and/or requirements not yet

complete. This surety shall be provided in the manner specified by the

e) This approval shall expire one year from the date of approval unless construction has begun.

Adopted by the Planning Commission of the City of Richfield, Minnesota this 22nd day of July 2019.

Chairperson, Richfield Planning Commission

ATTEST:

Secretary, Richfield Planning Commission

Code Requirements / Required Findings

Variances:

The applicant is proposing a large home remodel to address maintenance needs as well as accommodate a larger, multi-generational family. The applicant is requesting variances related to accessory building and garage square footage, total number of accessory storage buildings, and building setback requirements.

Subsection 518.05, Subd. 2:

 Accessory Storage Building (3 storage buildings proposed/1 storage building permitted)

Subsection 518.05, Subd. 3:

o Private Garages (1616 aggregate square feet proposed/1300 aggregate square feet permitted)

Subsection 518.13, Subd. 2:

Single-Family Building Interior Side Setback – (6.8 feet proposed/10 feet permitted)

The findings necessary to approve variances are as follows (Subsection. 547.11):

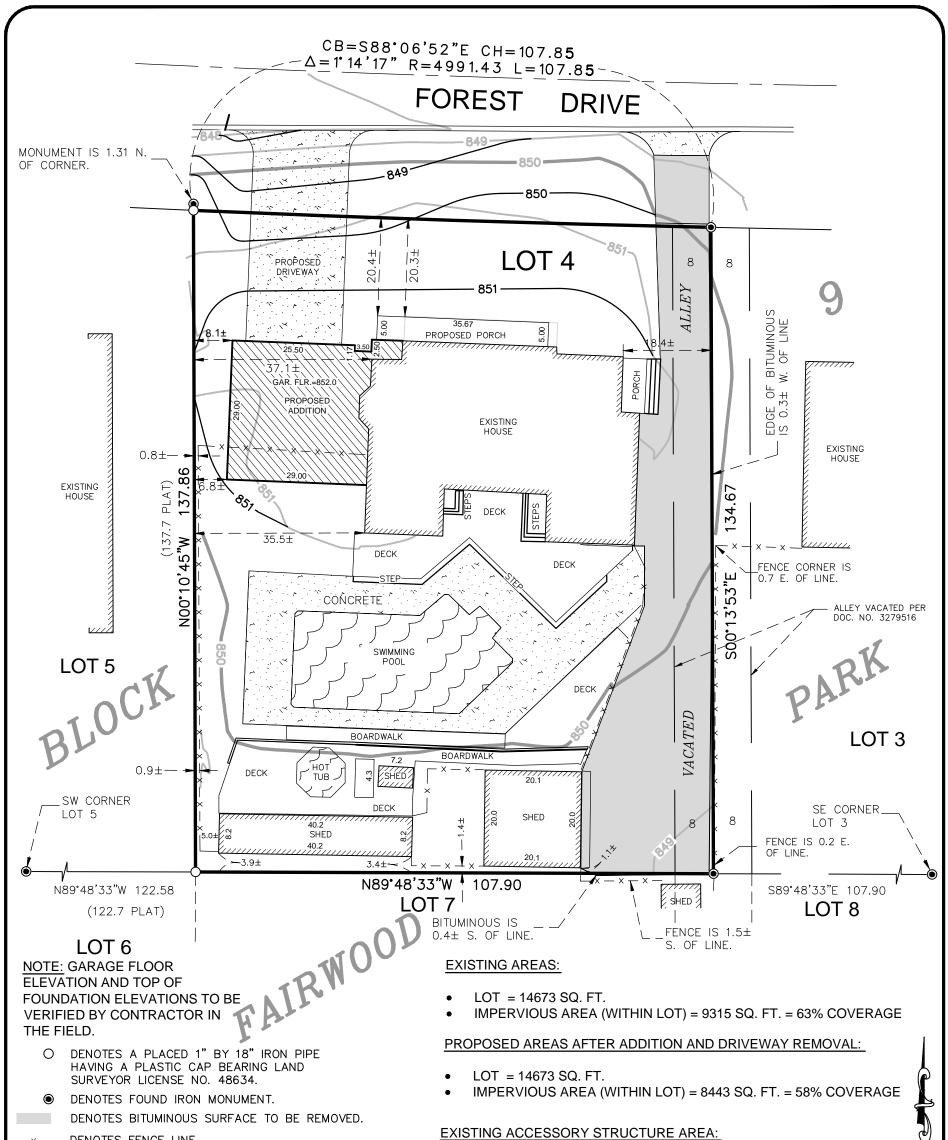
1. There are "practical difficulties" that prevent the property owner from using the property in a reasonable manner. Strict enforcement of the Zoning Code subsections listed above would cause a practical difficulty by limiting the property owner's ability to construct an attached two-car garage, which is permitted in this district, while also maintaining the existing structures on the lot.

2. There are unusual or unique circumstances that apply to the property which were not created by the applicant and do not apply generally to other properties in the same zone or vicinity. The layout of the lot and the size of the existing accessory structures restricts the size and location of an attached garage that could be constructed. The orientation of the house relative to the lot lines does not allow enough space to construct an attached two-car garage and meet setback requirements. Additionally, the combined square footage of the existing accessory structures would limit the size of garage that could be constructed. There are other properties in the same zone or vicinity that have attached two-car garages of a similar size and style and some appear to not meet side setback requirements.

3. The variance would not alter the character of the neighborhood or the *locality*. Granting a variance to allow an attached two-car garage while permitting the existing accessory structures to remain will not alter the character of the neighborhood.

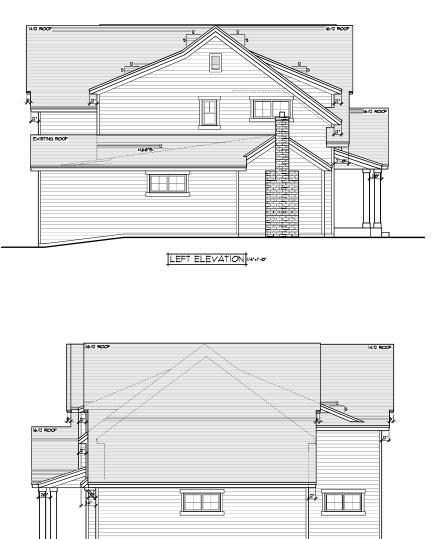
4. *The variance is the minimum necessary to alleviate the practical difficulty.* The variances requested are the minimum necessary to allow a functional two-car garage for the applicant's needs, while also allowing them to retain their existing accessory structures. The proposed 25 foot by 29 foot garage is not unusually large.

5. The variance is in harmony with the general purpose and intent of the ordinance and consistent with the Comprehensive Plan. The proposed attached garage and existing accessory structures will not adversely impact the aesthetics of the community or its health, safety and welfare and are consistent with the general purposes and intents of the Zoning Ordinance and Comprehensive Plan.



$- \times -$ DENOTES FENCE LINE.	EXISTING ACCESSORY STRUCTURE AREA:			
EXISTING PROPERTY DESCRIPTION (Document No. 919102)	• 764 SQ. FT. <u>PROPOSED ACC</u>	ESSORY STRUCTURE AREA	<u>.</u>	
Lot 4, Block 9, Fairwood Park, according to the plat thereof on file and of record in the office of the Register of Deeds, in and for Hennepin County, Minnesota.	• 764 SQ. FT. PROPOSED GAR	AGE ADDITION AREA:	0 20 40	
Subject to restrictions, reservations and easements of record, if any.	• 852 SQ. FT.	THE HENN	SHOWN HEREON ARE ORIENTED TO EPIN COUNTY COORDINATE SYSTEM, 996 ADJUSTMENT (HARN)	
CERTIFICATE OF SURVEY FOR:		I hereby certify that this s		
HBRE		prepared by me or under my direct supervision and that I am a duly Licensed Land Surveyor under the laws of the State of Minnesota.		
JOHNSON & SCOFIELD SURVEYING AND ENGIN	EERING	Revised: 05/28/2019 Revised: 06/10/2019 Revised: 06/21/2019 Revised: 07/3/2019	Mitchell A. Scofield Minnesota License No. 48634 Date: 5/10/2019	
1112 HIGHWAY 55, SUITE 201, HASTINGS, M (651) 438-0000	MN 55033	BK. NA PG. NA SHEET 1 OF 1 SHEETS	W.O.# DRAWING NUMBER 19-427 S-8156	





REVISIONS:

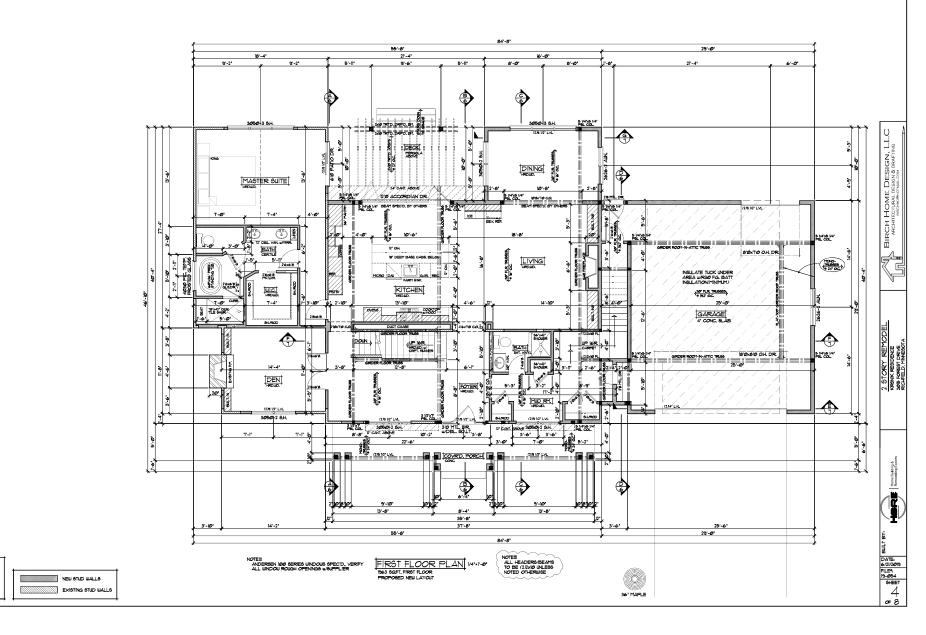
BIRCH HOME DESIGN, LLC ARCHTECTUAL DESIGN, LLC

> 2 STORY REMODEL Krenk residence 2016 forest drive Richfield, minesota

> > Hong Home Building &

RIGHT ELEVATION

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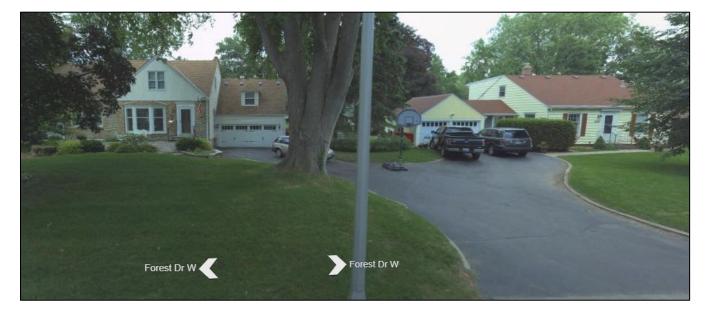


REVISIONS

2015 Forest Drive – Street View



View of Properties Across the Street



View of Properties to the East



Aerial View of 2015 Forest Drive and Surrounding Homes



2015 Forest Drive- VAR 7/2019 Surrounding Zoning & Comp Plan



R - Single Family Residential R-1 - Low-Density Single Family Residential

Comp Plan LDR -Low Density Residential PRK - Park

N

June 23, 2019

City of Richfield

To Whom it May Concern,

We are confirming in writing that we have met in person on Sunday, June 23rd and reviewed and agree to the initial home renovation plans for Renato and Christine Krsnik, survey, plans and drawing version S-8156 by Mitchell A Scofield for 2015 Forest Drive, Richfield, MN 55423. We understand that the property to the east side will exceed the set back and we agree as the neighbors this potential variance. Please see our signatures of support below. Subject to approval by the city of Richfield.

Neighbors in attendance:

Name, Address, signature, date

Julie Ogden and Michael Park Armstrong, 2101 Forest Drive, Richfield, MN 55423

Peter and Lois Flynn, 2009 Forest Drive, Richfield, MN 55423

James and Jodi Young, 2034 Forest Drive, Richfield, MN 55423

polld Th

Patrick & Kay Elliott

HAG3 LEE & ANNE

AGENDA SECTION: AGENDA ITEM # CASE NO.:

Public Hearings

3.

19-CUP-03, 19-CUP-04, 19-CUP-05, 19-CUP-06, 19-CUP-07, 19-CUP-08, 19-CUP-09



PLANNING COMMISSION MEETING 7/22/2019

REPORT PREPARED BY: Sadie Gannett, Assistant Planner

CITYPLANNER REVIEW: Melissa Poehlman, Asst. Community Development Director 7/16/2019

ITEM FOR COMMISSION CONSIDERATION:

Public hearing to consider a request for conditional use permits to allow small wireless facilities at multiple locations throughout the City.

EXECUTIVE SUMMARY:

SAC Wireless, on behalf of AT&T (Applicant) is requesting approval of conditional use permits (CUP) in order to allow the installation of small wireless facilities in several residential areas. The Applicant is proposing to replace five City-owned light poles and two utility poles with new poles that will accommodate the attachment of small wireless facilities. The poles are located in the right-of-way, but are adjacent to the following residential properties: 7044 Harriet Avenue, 7100 James Avenue, 6645 Thomas Avenue, 6845 Thomas Avenue, 7116 Lyndale Avenue, 7400 Nicollet Avenue, 7444 Upton Avenue.

These sites were identified by AT&T's radiofrequency engineers as areas where cellular coverage was lacking and where light poles, utility poles, or other structures that could feasibly hold a small wireless facility were present. The small wireless facilities are able to fill pockets of poor cellular coverage that signals from a traditional tower cannot reach.

In 2017, State laws were changed to allow wireless service providers the right to install facilities in the right-ofway. While the City's authority to deny permits in the right-of-way is limited, cities can make the facilities a conditional use in single-family residential areas. The City Council did this in 2017. Conditional use permits in the R district are required to be consistent with the City's Comprehensive Plan, policy, goals and Zoning Code. They also must not negatively impact public health and safety or interfere with governmental facilities, utilities or services. Radiofrequency emissions are regulated by the Federal Communications Commission. Frequency studies have been conducted on all of the proposed sites in accordance with these regulations and all sites were determined to be within the acceptable limits for the general public. Staff finds that the proposal meets all of the required conditions and it is reasonable to allow small wireless facilities to be colocated with existing facilities in the right-of-way for the purpose of improved cellular coverage. A full discussion of CUP requirements can be found in an attachment to this report.

Finding that the proposal meets requirements, staff recommends approval of the CUP.

RECOMMENDED ACTION:

Conduct and close a public hearing and by motion: Recommend approval of several resolutions for conditional use permits to allow small wireless facilities at multiple locations.

BASIS OF RECOMMENDATION:

A. HISTORICAL CONTEXT

State law gives "telecommunications right of way users" the right to install facilities in the right of way. This right is subject to local governmental authority to manage right of way permitting. In 2017, the Minnesota Legislature amended the definition of a "telecommunications right of way user" to include persons deploying facilities to provide "wireless service." Wireless providers may deploy a "small wireless facility" or a "wireless support structure" in the right-of-way.

While the City's authority to deny permits in the right-of-way is limited, cities may make such facilities or structures a conditional use in right of way located in "a district or area zoned for single-family residential use or within a historic district." The City Council held a work session to discuss this issue on July 25, 2017 and directed City staff to move forward with an amendment to make these facilities a conditional use in single-family residential areas.

B. POLICIES (resolutions, ordinances, regulations, statutes, etc):

- Small wireless facilities are a conditionally permitted use in the Single-Family Residential (R) District.
- The Federal Communications Commission (FCC) has established guidelines for human exposure to Radio Frequency Electromagnetic Fields. Separate evaluations of each individual site are included as attachments to this report. All sites will comply with established FCC guidelines.
- A full discussion of general CUP requirements and required findings can be found as an attachment to this report.

C. CRITICAL TIMING ISSUES:

60-DAY RULE: The 60-day clock 'started' when a complete application was received on July 12, 2019. A decision is required by September 10, 2019 or the Council must notify the Applicant that it is extending the deadline (up to a maximum of 60 additional days or 120 days total) for issuing a decision.

D. FINANCIAL IMPACT:

None.

E. LEGAL CONSIDERATION:

- Notice of this public hearing was published in the Sun Current newspaper and mailed to properties within 350 feet of the site on July 11, 2019.
- Council consideration has been tentatively scheduled for August 13, 2019.

ALTERNATIVE RECOMMENDATION(S):

- Recommend approval of the proposal with modifications
- Recommend denial of the conditional use permit with a finding that requirements are not met.

PRINCIPAL PARTIES EXPECTED AT MEETING:

Joe Goldshlack, applicant

ATTACHMENTS:

	Description	Туре
۵	Resolution	Resolution Letter
D	Required Findings	Backup Material
D	Site Plan	Backup Material
D	Zoning Map	Backup Material
D	Frequency Study - 6645 Thomas Ave	Backup Material

- **D** Frequency Study 6845 Thomas Ave
- **D** Frequency Study 7044 Harriet Ave
- **D** Frequency Study 7100 James Ave
- **D** Frequency Study 7116 Lyndale Ave
- Frequency Study 7400 Nicollet Ave
- **D** Frequency Study 7444 Upton Ave

Backup Material Backup Material Backup Material Backup Material Backup Material

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 6645 THOMAS AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 6645 Thomas Avenue, legally described as:

That part of Thomas Avenue South adjacent to Lot 15, Block 4, "Tingdale Bros.'Lincoln Hills".

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.

- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.
- 5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 6845 THOMAS AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 6845 Thomas Avenue, legally described as:

That part of W 69th Street adjacent to Lot 13, Block 4, "Tingdale Bros.'Lincoln Hills Third Addition"

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.

- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.
- 5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 7044 HARRIET AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 7044 Harriet Avenue, legally described as:

That part of W 71st Street adjacent to Lot 9, Block 4, Augsburg Park

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.
- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been

issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.

5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 7100 JAMES AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 7100 James Avenue, legally described as:

That part of James Avenue South adjacent to Lot 1, Block 6, "Forest Lawn"

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.
- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been

issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.

5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 7116 LYNDALE AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 7116 Lyndale Avenue, legally described as:

That part of Lyndale Avenue South adjacent to Lot 5 and South 1/2 of Lot 4, Block 2 "Wood Lake Shores"

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.

- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.
- 5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 7400 NICOLLET AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 7400 Nicollet Avenue, legally described as:

That part of Nicollet Avenue South adjacent to Lot 1, Block 1, "Nicollet View Gardens"

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.

- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.
- 5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

Elizabeth VanHoose, City Clerk

RESOLUTION APPROVING A CONDITIONAL USE PERMIT TO ALLOW A SMALL WIRELESS FACILITY IN THE RIGHT-OF-WAY ADJACENT TO 7444 UPTON AVENUE

WHEREAS, an application has been filed with the City of Richfield which requests a conditional use permit for a small wireless facility to be co-located on a city-owned light pole in the right-of-way on land generally located at 7444 Upton Avenue, legally described as:

That part of Upton Avenue South adjacent to Lot 8, Block 2, Penn Lake Terrace 2nd Add

WHEREAS, the Planning Commission of the City of Richfield held a public hearing for the requested conditional use permit at its July 22, 2019 meeting; and

WHEREAS, the Planning Commission recommended approval of the conditional use permit for a small wireless facility; and

WHEREAS, notice of the public hearing was published in the Sun Current on July 11, 2019 and mailed to properties within 350 feet of the subject property on July 9, 2019; and;

WHEREAS, the requested conditional use permit meets the requirements necessary for issuing a conditional use permit as specified in Richfield's Zoning Code, Subsection 547.09; and

- 1. The City Council adopts as its Findings of Fact the **WHEREAS** clauses set forth above.
- 2. A conditional use permit is issued to allow a small wireless facility on the Subject Property legally described above.
- 3. This conditional use permit is subject to the following conditions in addition to those specified in Section 547.09 of the City's Zoning Ordinance:
 - a) The recipient of this approval shall record this Resolution with the County, pursuant to Minnesota Statutes Section 462.36, Subd. 1 and the City's Zoning Ordinance Section 547.11, Subd. 7; and
 - b) The applicant is responsible for obtaining all required permits, compliance with all requirements detailed in the City's Administrative Review Committee Report dated July 2, 2019, and compliance with all other City and State regulations.
 - c) Approval does not constitute approval of the Small Cell Pole Attachment permit required by the Public Works Department or the Electrical Permit required by the Inspections Department.
 - d) Separate approval of an antenna permit is not required.

- 4. The conditional use permit shall expire one year after issuance unless 1) the use for which the permit was granted has commenced; or 2) Building permits have been issued and substantial work performed; or 3) Upon written request of the applicant, the Council extends the expiration date for an additional period not to exceed one year. Expiration is governed by the City Zoning Ordinance, Section 547.09, Subdivision 9.
- 5. This conditional use permit shall remain in effect for so long as conditions regulating it are observed, and the conditional use permit shall expire if normal operation of the use has been discontinued for 12 or more months, as required by the City's Zoning Ordinance, Section 547.09, Subd. 10.

Adopted by the City Council of the City of Richfield, Minnesota this 13th day of August 2019.

Maria Regan Gonzalez, Mayor

ATTEST:

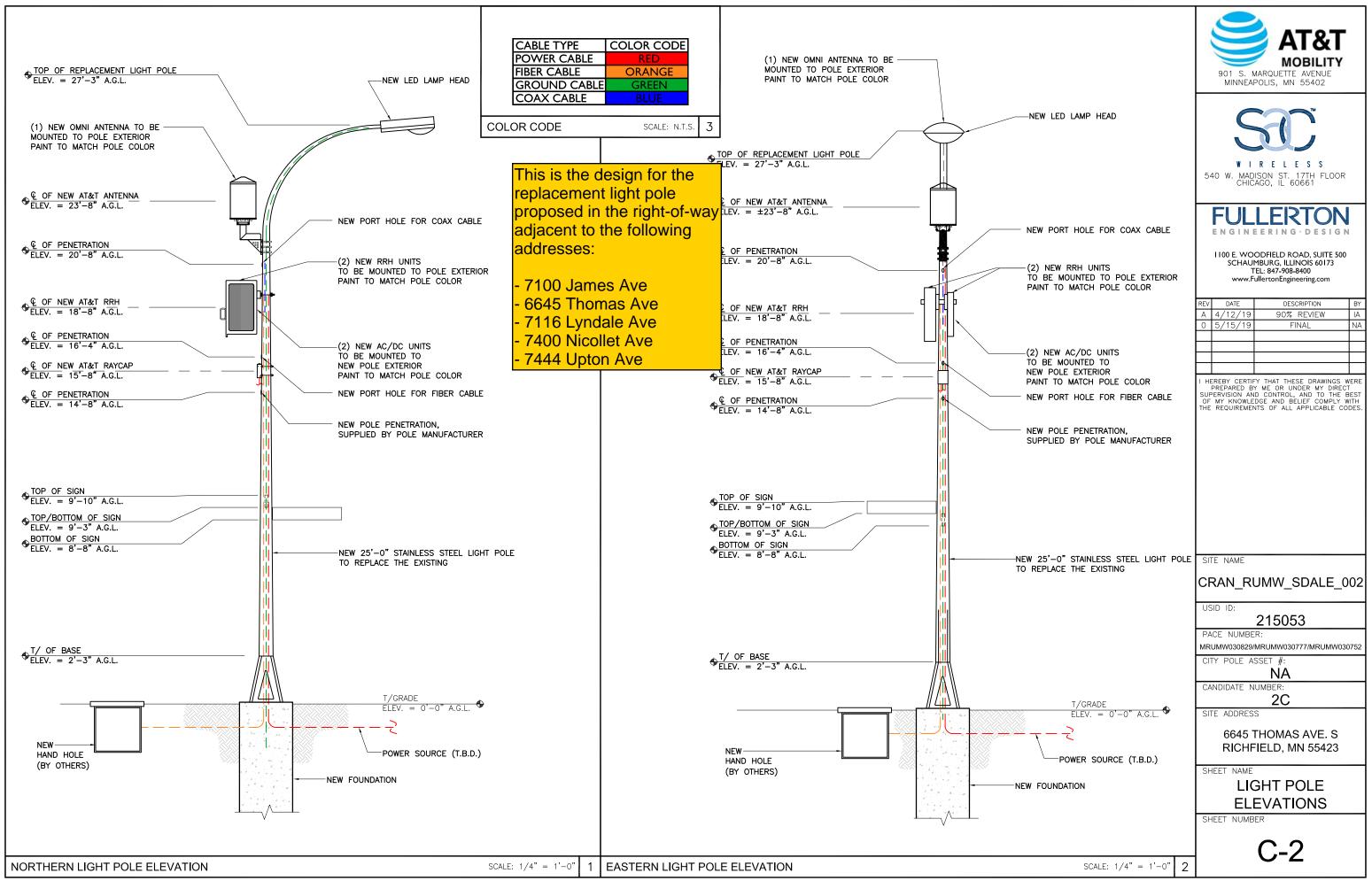
Elizabeth VanHoose, City Clerk

Code Requirements / Required Findings

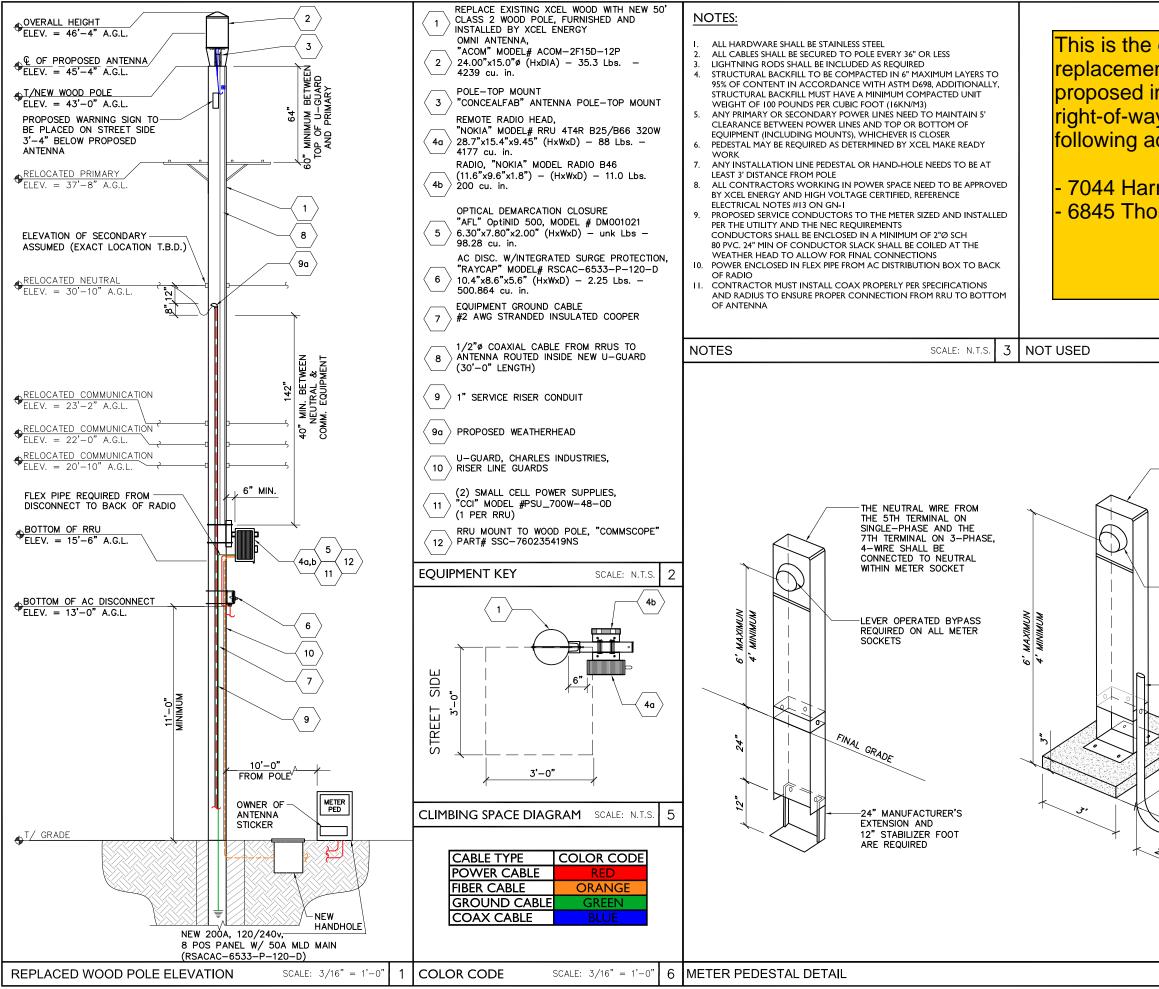
Part 1 – Conditional Use Permit: The findings necessary to issue a Conditional Use Permit (CUP) are as follows (547.09, Subd. 6):

- The proposed use is consistent with the goals, policies, and objectives of the City's Comprehensive Plan. This requirement is met. The locations of these facilities are designated as "Low-Density Residential". The Utilities section of the Comprehensive Plan states that the provision of public and private utilities is essential to a healthy community. This proposal to upgrade privately owned wireless equipment is consistent with the Comprehensive Plan.
- 2. The proposed use is consistent with the purposes of the Zoning Code and the purposes of the zoning district in which the applicant intends to locate the proposed use. This requirement is met. The purpose of the Zoning Code is to protect and promote the public health, safety, comfort, aesthetics, economic viability, and general welfare of the City. The proposed use is not inconsistent with these intentions. The properties are in the Single-Family Residential (R) District. The purpose of the R District is to provide residential locations that are safe, attractive and quiet. The proposed use of attaching small wireless facilities to existing poles in the right-of-way does not pose threat to this and is conditionally permitted in this district.
- 3. The proposed use is consistent with any officially adopted redevelopment plans or urban design guidelines. There are no specific redevelopment plans that apply to the properties.
- 4. The proposed use is or will be in compliance with the performance standards specified in Section 544 of this code. Section 544 of the code does not apply to small wireless facilities in the Single-Family Residential District.
- 5. The proposed use will not have undue adverse impacts on governmental facilities, utilities, services, or existing or proposed improvements. Small wireless facilities located in the right-of-way require a permit from Public Works and are required to meet certain conditions. The facilities will be co-located with existing utilities. The City's Public Works and Engineering Departments have reviewed the proposal and do not anticipate any issues.
- 6. The use will not have undue adverse impacts on the public health, safety, or welfare. No adverse impacts are anticipated.
- 7. There is a public need for such use at the proposed location. Maintaining and providing up-to-date wireless facilities at multiple locations is necessary to maintain a thriving community.

8. The proposed use meets or will meet all the specific conditions set by this code for the granting of such conditional use permit. This requirement is met.

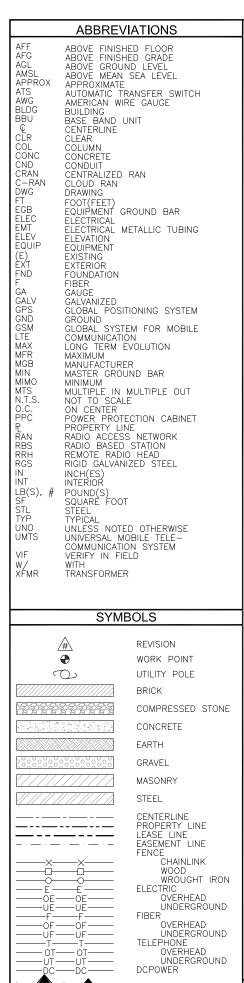


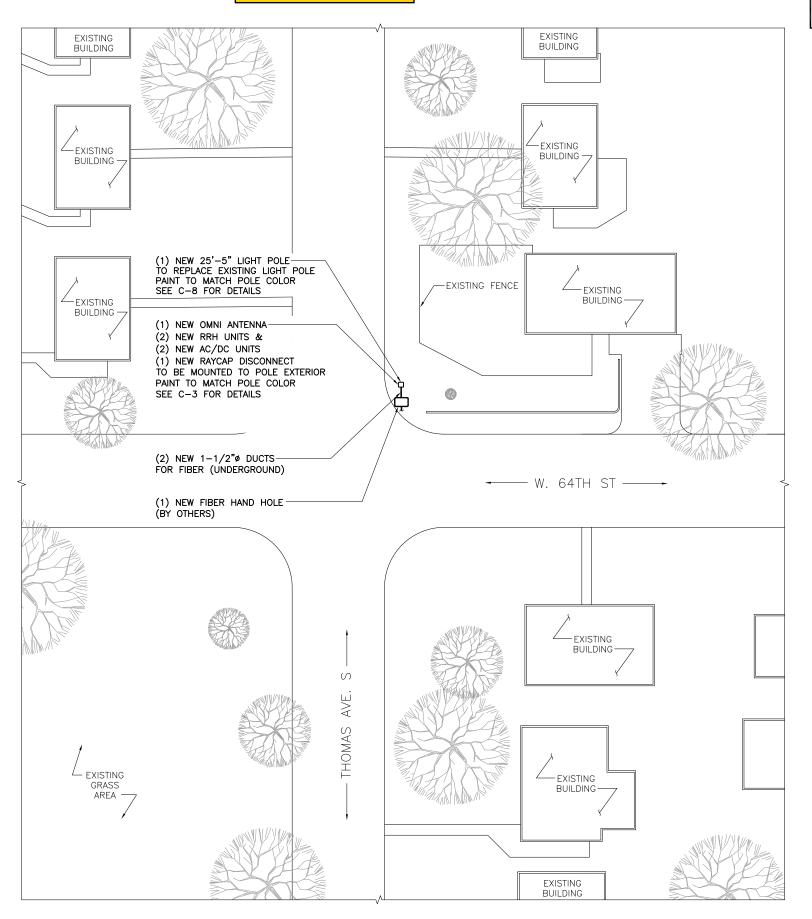
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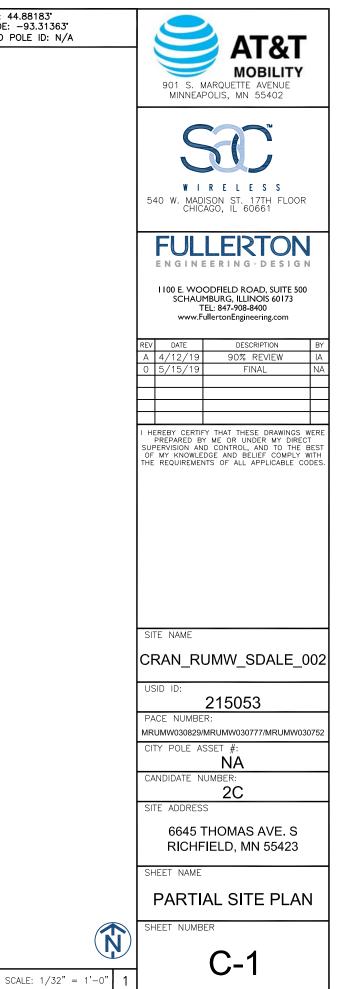
6645 Thomas Ave



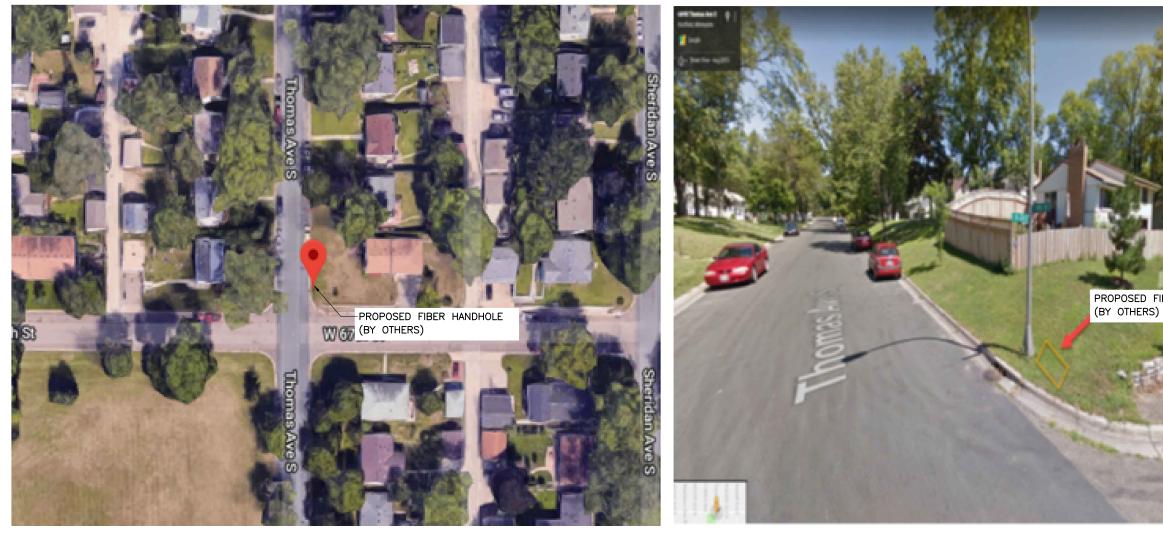


PARTIAL SITE PLAN SECTION REFERENCE

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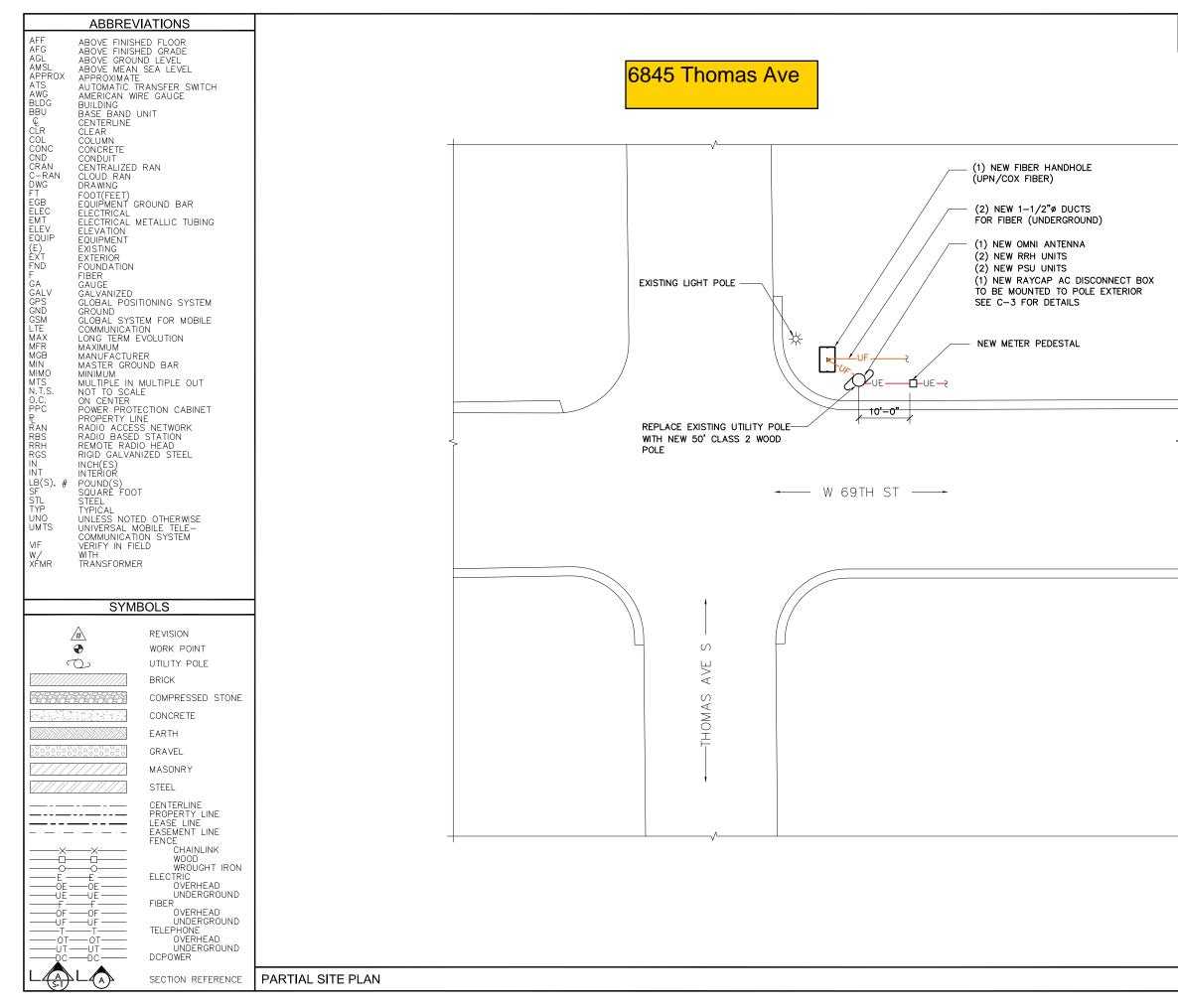


6645 Thomas Ave

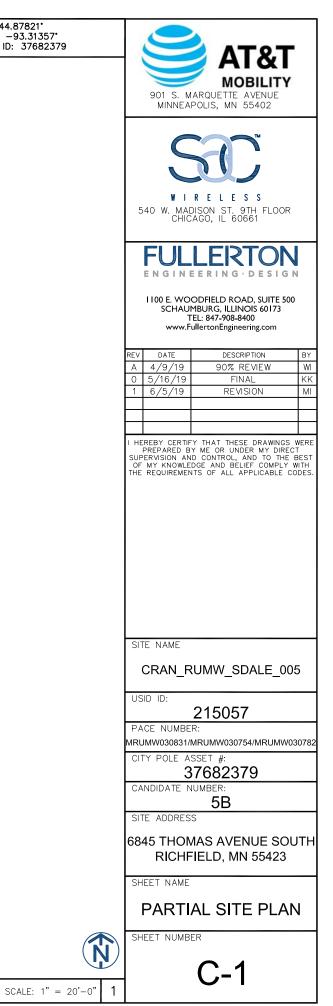




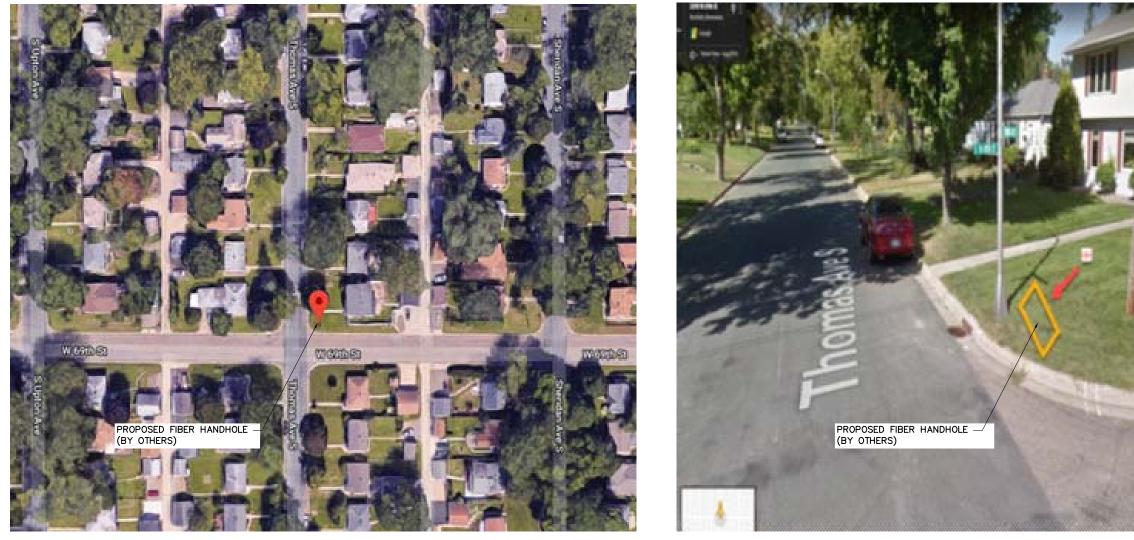
PROJECT# 2019.0101.0537

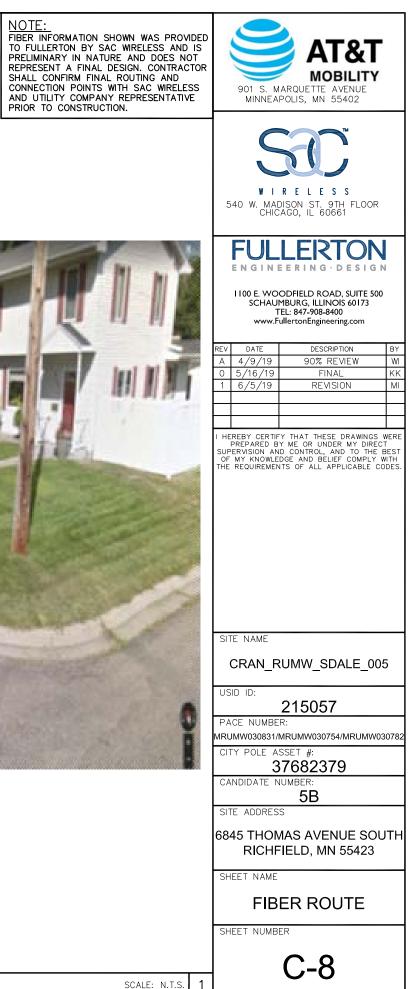


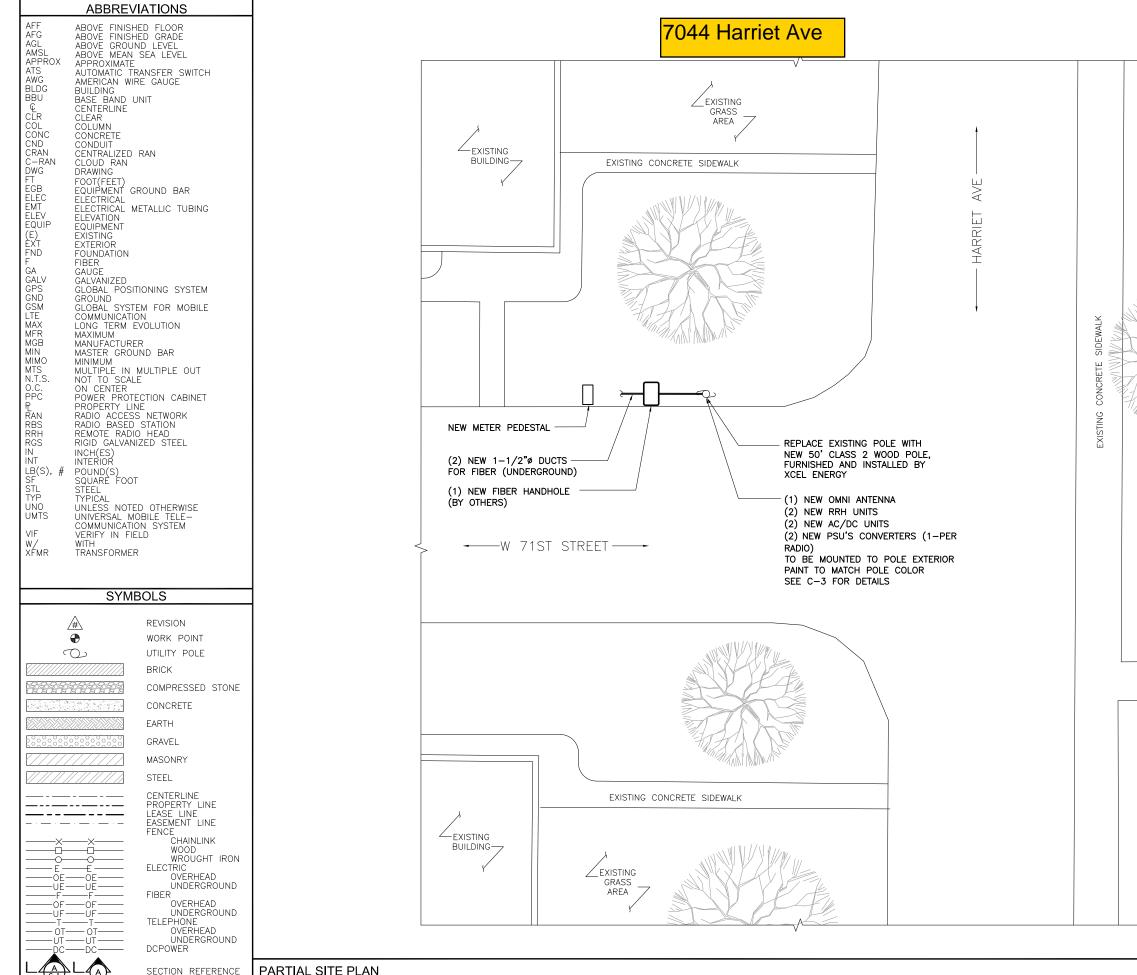
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LONGITUDE:	-93.31357*
XCEL POLE I	D: 37682379



6845 Thomas Ave





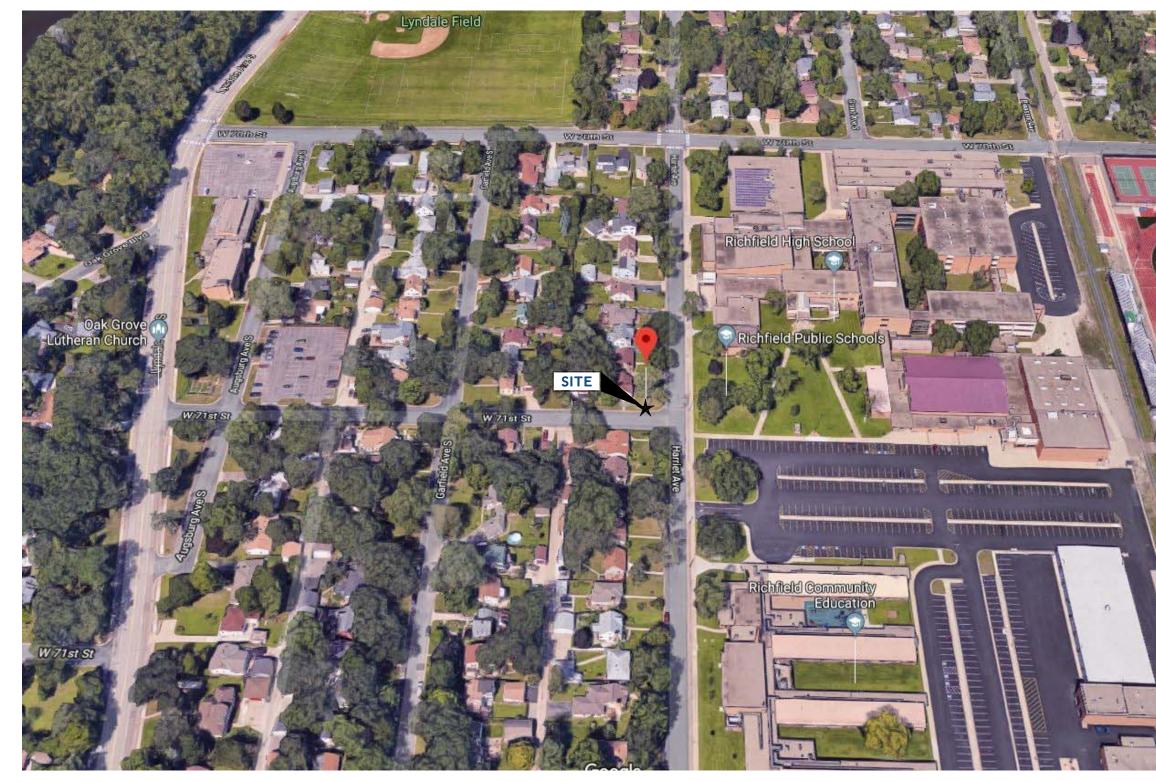


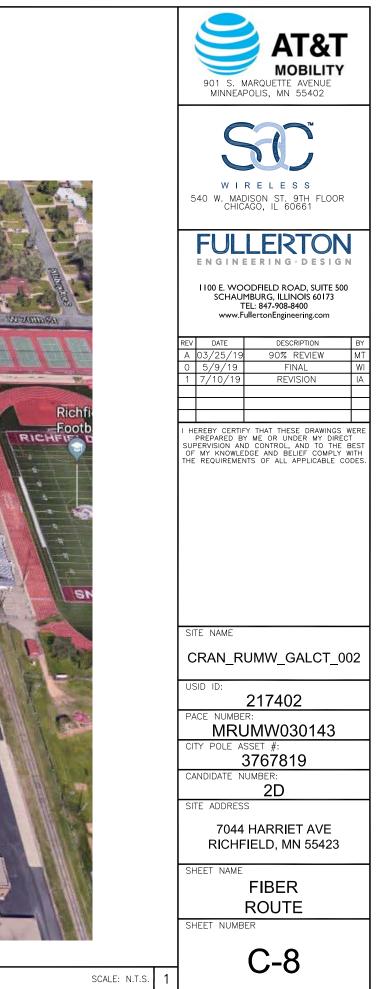
PARTIAL SITE PLAN

-							
LATITUDE: 44.87454* LONGITUDE: -93.28600* XCEL POLE ID: 3767819	901 S. MARQUETTE AVENUE MINNEAPOLIS, MN 55402						
	WIRELESS 540 W. MADISON ST. 9TH FLOOR CHICAGO, IL 60661						
	FULLERTON ENGINEERING-DESIGN 1100 E. WOODFIELD ROAD, SUITE 500 SCHAUMBURG, ILLINOIS 60173 TEL: 847-908-8400 www.FullertonEngineering.com						
	REV DATE DESCRIPTION BY A 03/25/19 90% REVIEW MT						
	0 5/9/19 FINAL WI						
	1 7/10/19 REVISION IA						
	I HEREBY CERTIFY THAT THESE DRAWINGS WERE PREPARED BY ME OR UNDER MY DIRECT						
>	SITE NAME						
	CRAN_RUMW_GALCT_002						
	217402 PACE NUMBER:						
	MRUMW030143						
	3767819 CANDIDATE NUMBER:						
	SITE ADDRESS 7044 HARRIET AVE RICHFIELD, MN 55423						
	SHEET NAME PARTIAL SITE PLAN						
_							
SCALE: 1/16" = 1'-0" 1	sheet number						
SUALE: 1/10 = 1-0	l						

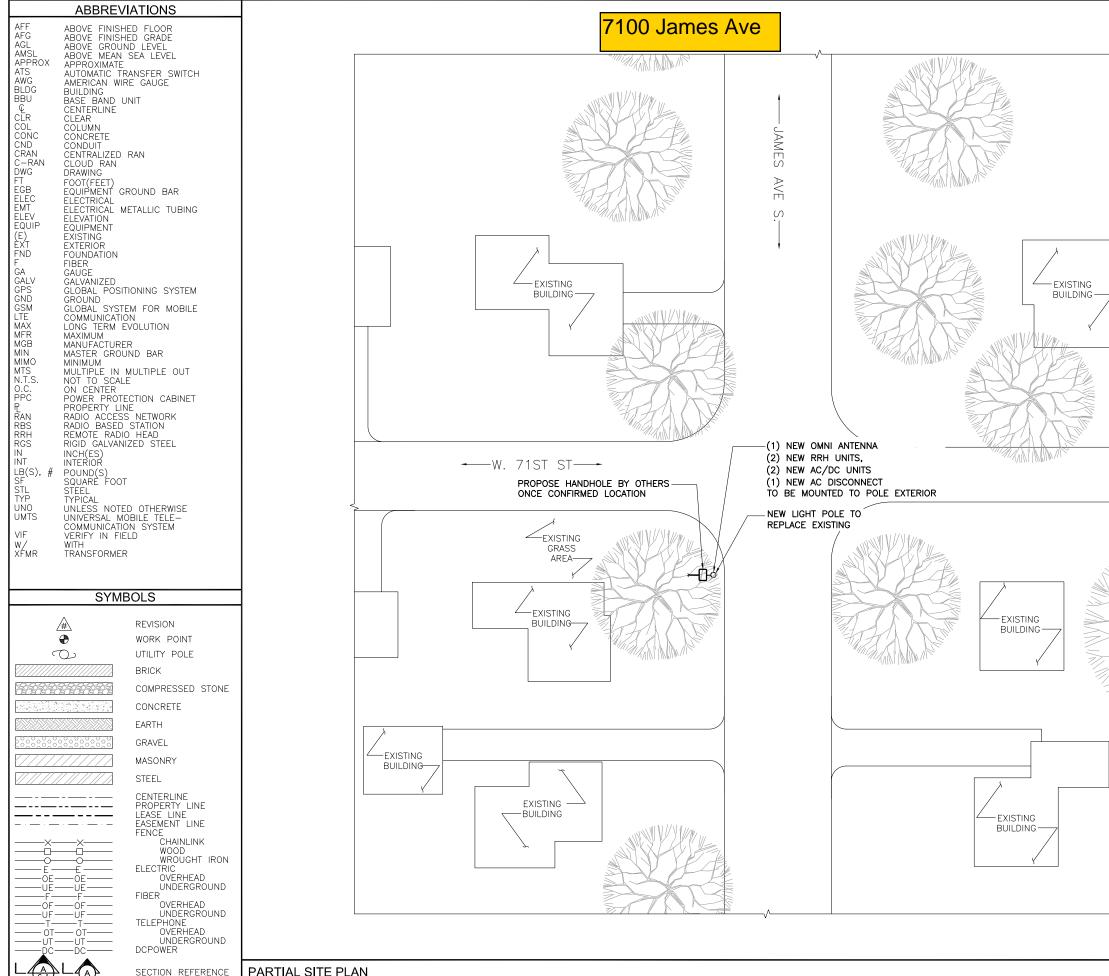
NOTE: FIBER MAP WILL BE ADDED WHEN AVAILABLE

7044 Harriet Ave



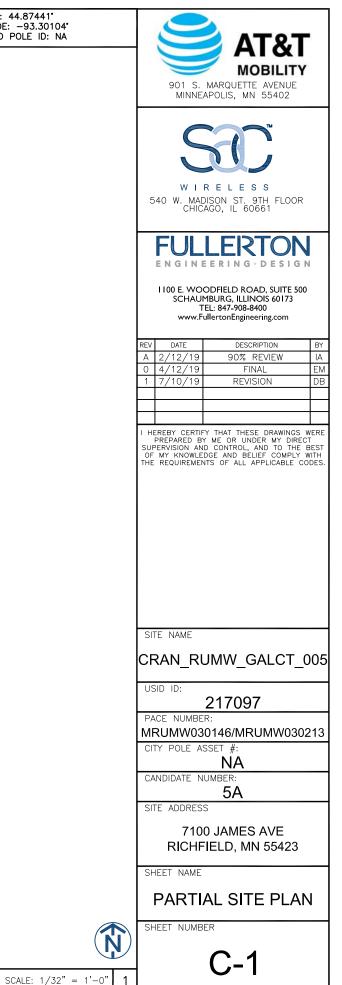


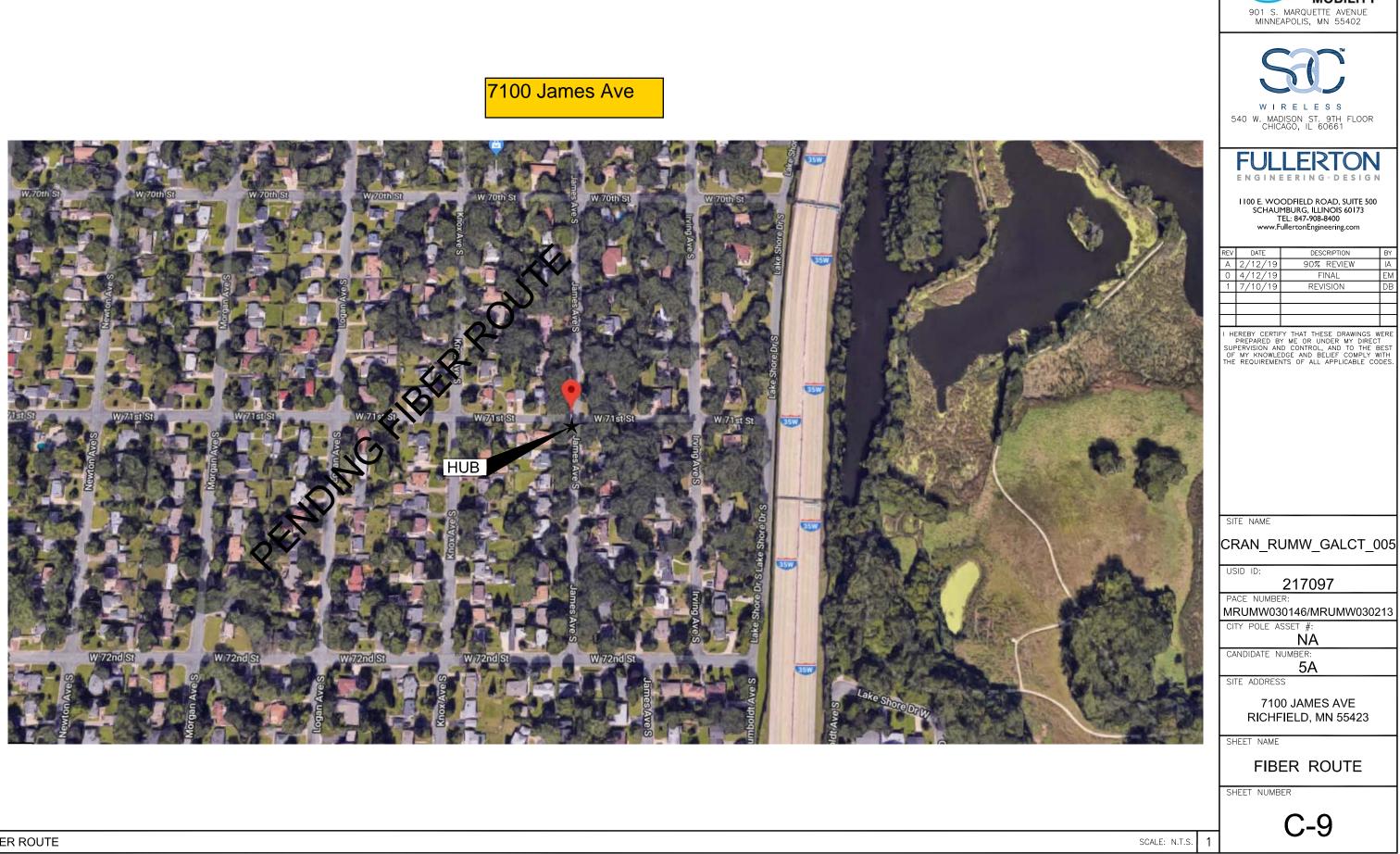
PROJECT# 2019.0101.0550



PARTIAL SITE PLAN

LATITUDE: 44.87441* LONGITUDE: -93.30104* RICHFIELD POLE ID: NA



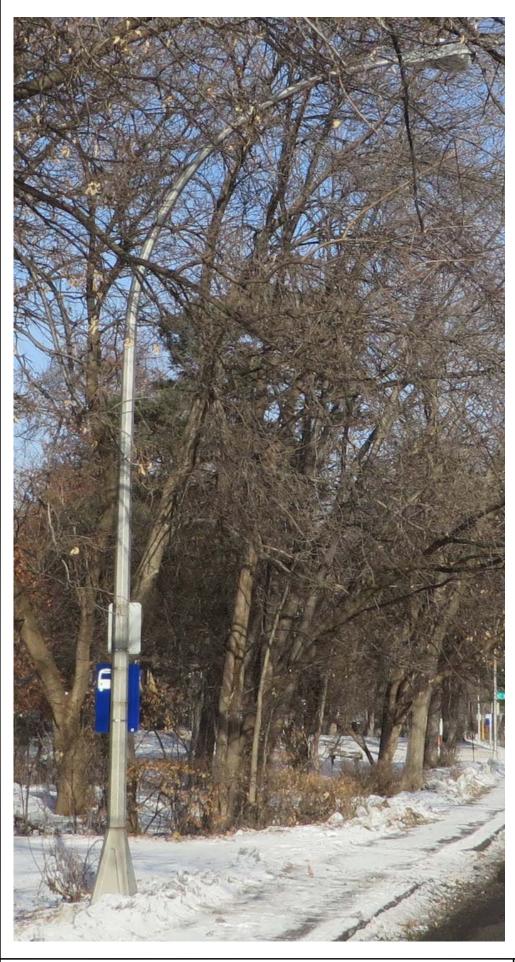


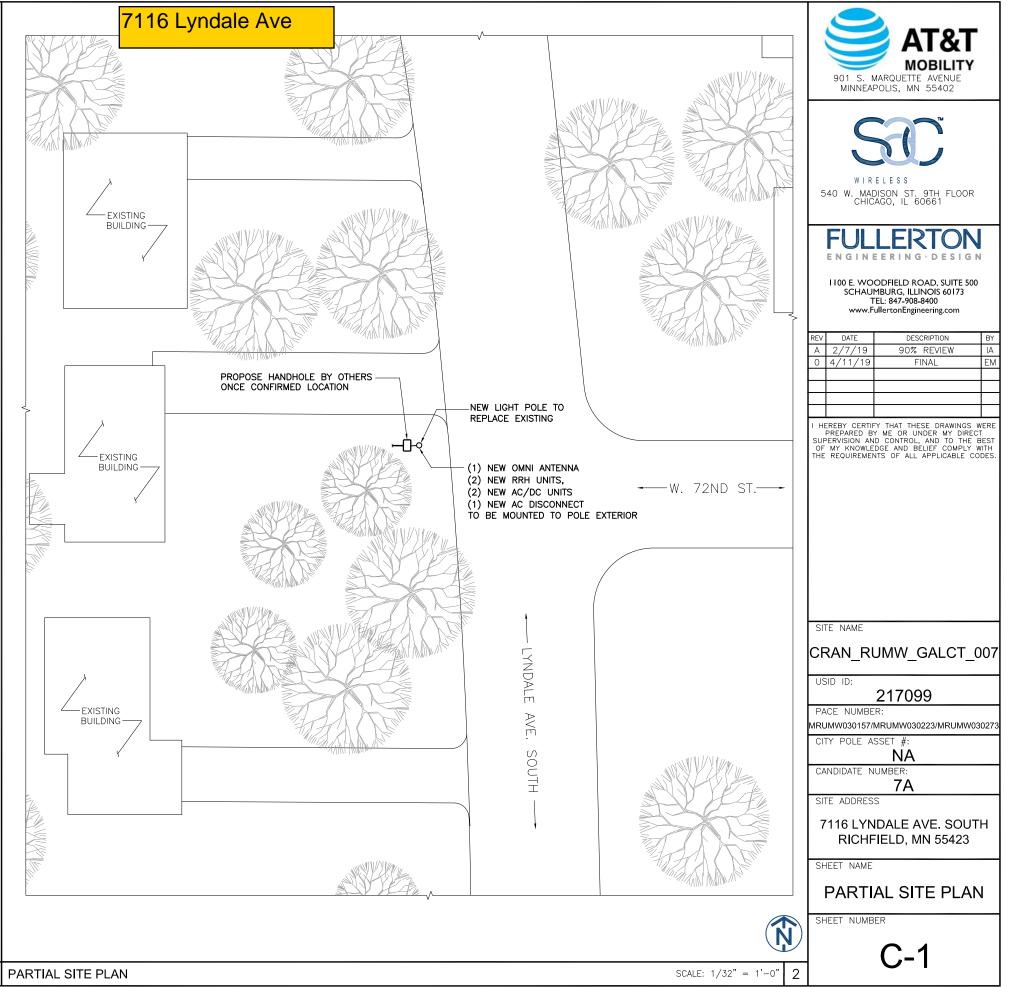
FIBER ROUTE

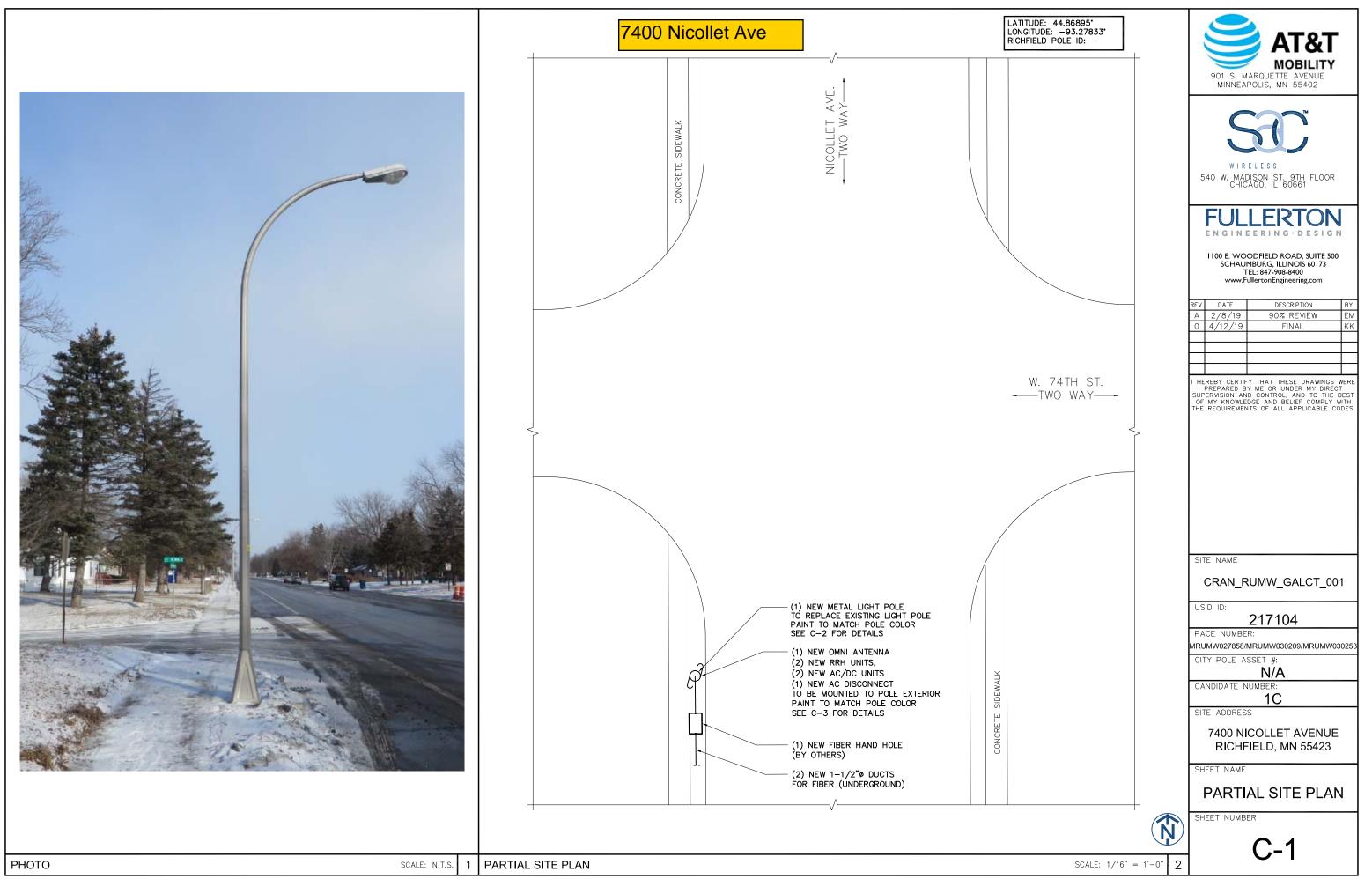
PROJECT# 2019.0101.0576

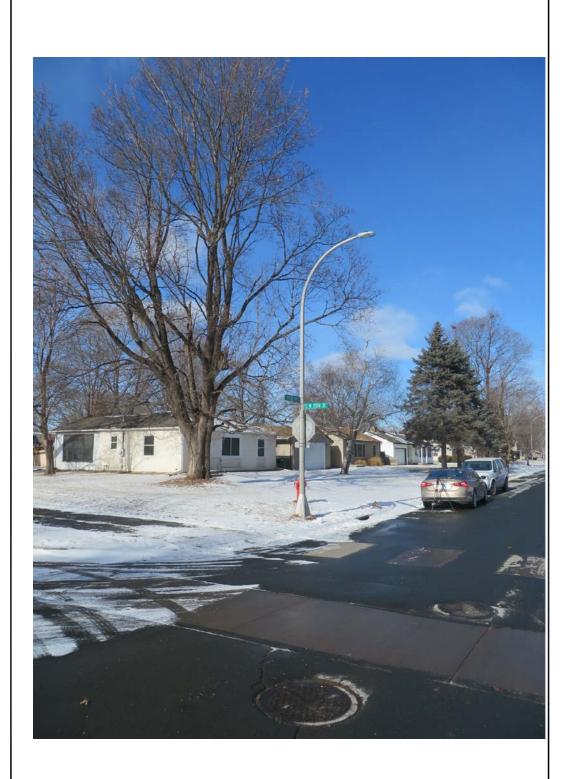
AT&T MOBILITY

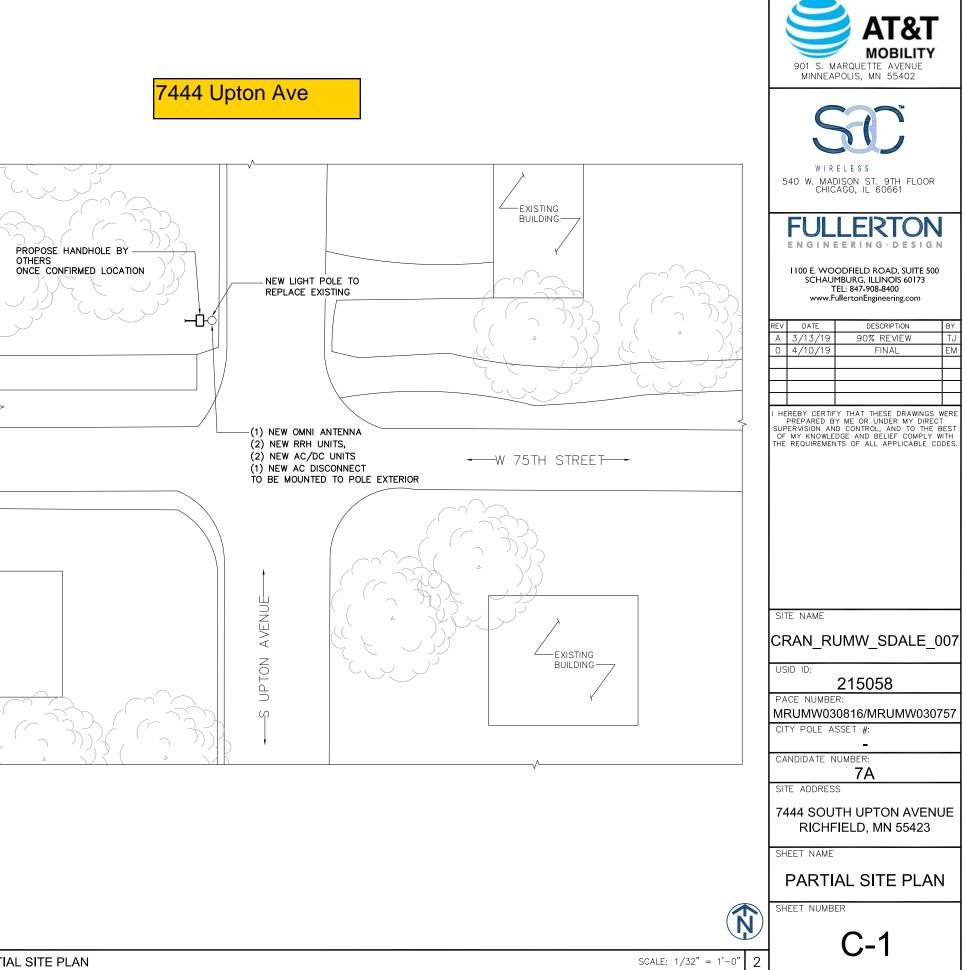
FM



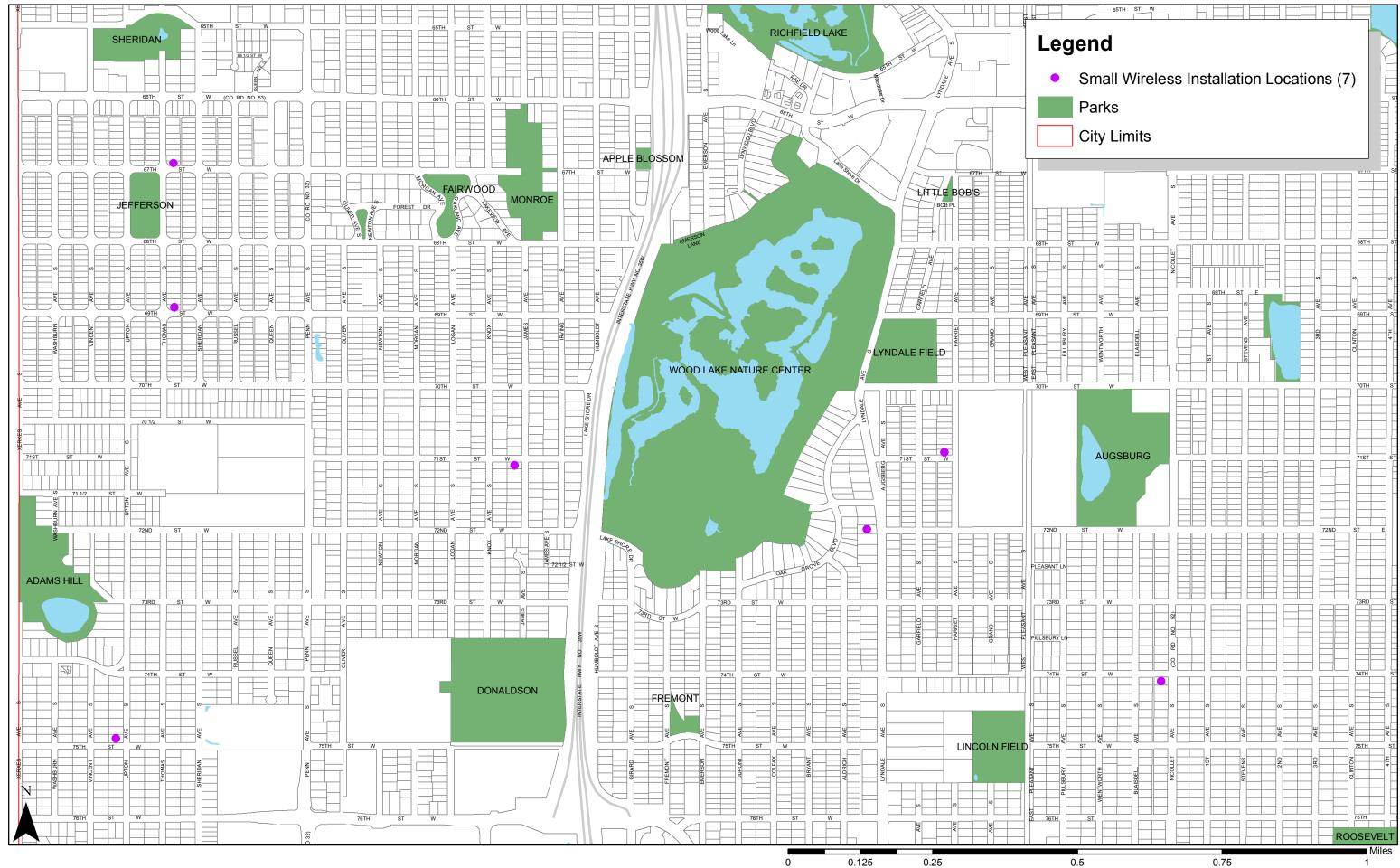








Small Wireless Installation Locations - July 2019



SITESAFE



SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826417 USID – 215053 Site Name – CRAN_RUMW_SDALE_002 (MRUMW030829) 6645 THOMAS AVE. SOUTH RICHFIELD, MN 55423

Latitude: N44-52-54.59 Longitude: W93-18-49.07 Structure Type: Light Pole

R

Report generated date: May 3, 2019 Report by: Scott Broyles Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the	<1% General Public Limit
Ground	
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: 215053_CRAN_RUMW_SDALE_002_MRUMW030829_RFDS 4.16.19

CD's: 215053_CRAN_RUMW_SDALE_002_MRUMW030829_CDS (REV A) (1)

RF Powers Used: Customer Provided Powers

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor &	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Parapet Info			
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations		INFORMATION	Notice	Resce		CALITION	VAINING 013		<u>}</u>
	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access									
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

b. Proposed AT&T Signage

AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Walking	Warning 2	Barriers
Access			1101100		Cathorn		, and the second s	Warning 2	Damois
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

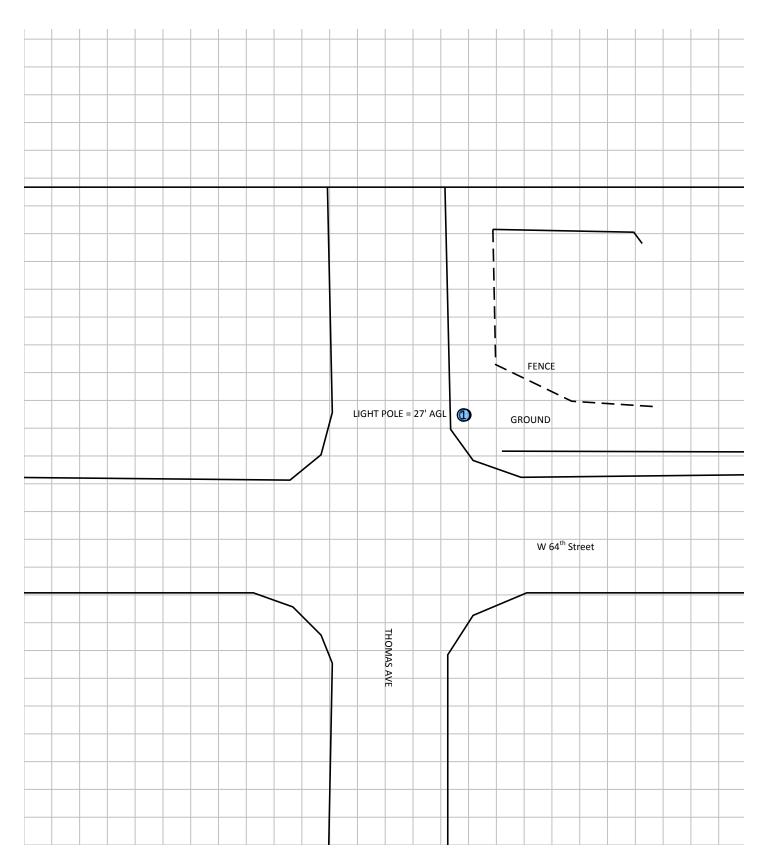


2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map
- RF Exposure Diagram
- RF Exposure Diagram Alpha Sector Elevation View

Site Scale Map For: CRAN_RUMW_SDALE_002







3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model	Туре	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)		MDT	EDT
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	57.25	TPO	dBmW	0	1	2636.3	6.96	40.3'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	57.95	TPO	dBmW	0	1	3243.4	7.16	40.3'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	34.95	TPO	dBmW	0	1	5.4	2.36	40.3'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed.



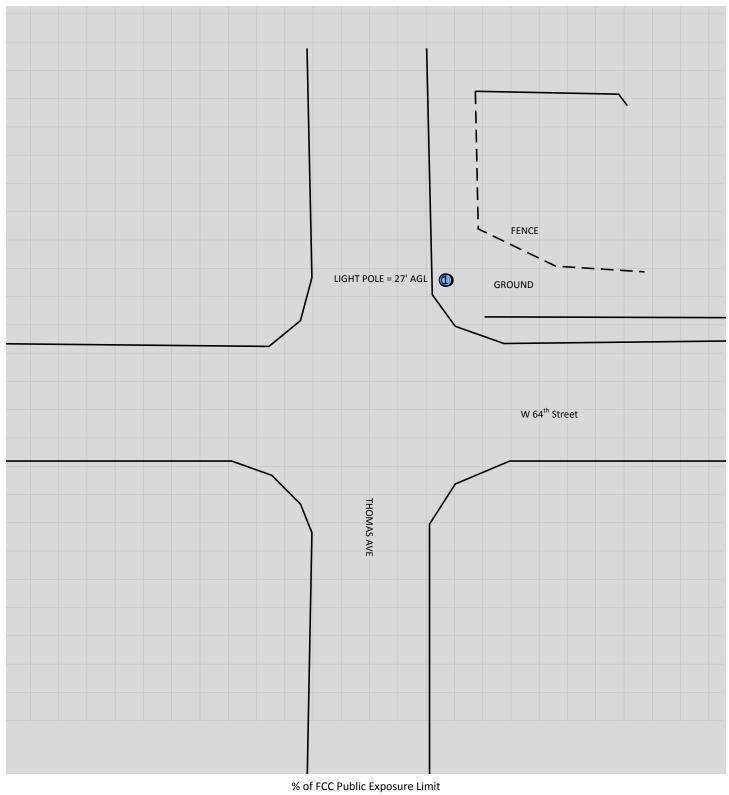
4 **Emission Predictions**

In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

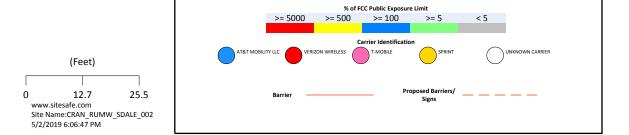
• Ground = 0'

The Antenna Inventory heights are referenced to the same level.

RF Exposure Simulation For: CRAN_RUMW_SDALE_002 Composite View

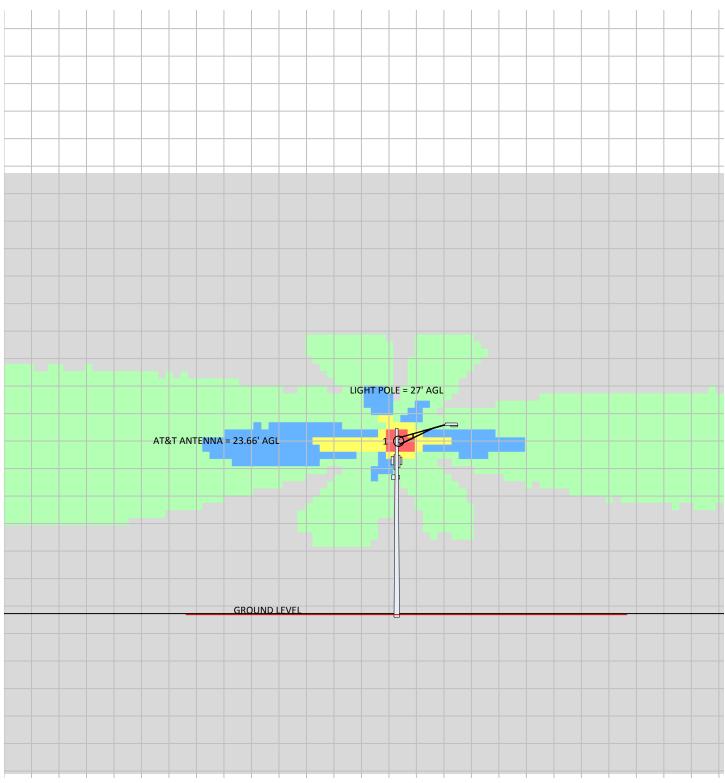


Spatial average 0' - 6'

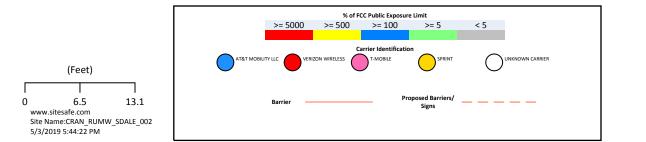


Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Spatially Averaged

RF Exposure Simulation For: CRAN_RUMW_SDALE_002 Elevation View



% of FCC Public Exposure Limit Spatial average 0' - 6'



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Light Pole Access Location

No Signs - Controlled access to the structure should be implemented by AT&T and the structure owner.

Notes:

- The area with the potential to exceed the General Public MPE limits is extends beyond 16' from the antenna. Sitesafe would normally recommend the appropriate RF signage on the structure at the vertical safe distance below the antenna; however, per AT&T's signage policy, no signage should be recommended in this instance and controlled access to the structure should be implemented by AT&T and the structure owner.
- MPE is calculated to be 15,113.26 at the antenna level and MPE safe Distance is 27' Horizontal and 4' vertical.
- Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.



6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Scott Broyles.

<u>May 3, 2019</u>



Appendix A - Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

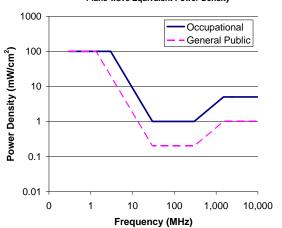
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E)	Magnetic Field Strength	Power Density (S) (mW/cm²)	Averaging Time E ² , H ² or S (minutes)
	(V/m)	(H) (A/m)		
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f²)*	6
30-300	61.4	0.163	1.0	6
300-1500			f/300	6
1500-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

Frequency	Electric	Magnetic	Power	Averaging Time E ² ,
Range	Field	Field	Density (S)	H ² or S (minutes)
(MHz)	Strength (E)	Strength	(mW/cm²)	
	(V/m)	(H) (A/m)		
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f²)*	30
30-300	27.5	0.073	0.2	30
300-1500			f/1500	30
1500-			1.0	30
100,000				
f = frequ	uency in MHz	*Plane-\	wave equivale	ent power density

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C - Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

<u>Training and Qualification Verification:</u> All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas</u>: There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

- Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
- Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
- Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. Blue areas should be accessible only to RF trained workers.
- Yellow represents areas predicted to exceed Occupational MPE limits. Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.
- Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. Red indicates that the RF levels must be reduced prior to access. An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E - Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.



Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf

SITESAFE

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SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826418 USID – 215057 Site Name – CRAN_RUMW_SDALE_005 (MRUMW030831)

6845 Thomas Avenue South Richfeld, MN 55423

Latitude: N44-52-41.56 Longitude: W93-18-48.85 Structure Type: Utility Pole

Report generated date: June 24, 2019 Report by: Zyotty Thamsil Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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A	PPENDIX D – RF EMISSIONS 1	17
A	PPENDIX E – ASSUMPTIONS AND DEFINITIONS 1	8
	General Model Assumptions	
A	PPENDIX F – DEFINITIONS 1	9
A	PPENDIX G – REFERENCES	21



1 General Site Summary

1.1 Report Summary

AT&T Mobil	ity, LLC		Summary							
Max Cumu	lative Simulated RFE Le	vel on the Ground	<1% General Public Limit							
Compliant	per FCC Rules and Reg	julations?	Will E	Be Compliant						
Compliant	per AT&T Mobility, LLC'	s Policy?	No							
Maximum Permissible Exposure (MPE) Summary										
% of FCC General % of FCC Location % of FCC General Public/Uncontrolled Occupational/Control Exposure Limit Exposure Limit				Power Density (mW/cm²)	Occupational Approach Distance (in)	General Public Approach Distance (in)				
		Proposed Ec	quipm	ent						
Antenna Face Level	3,709.9	742.0		37.1	60"	168"				
UE Relay Level	N/A	N/A	N/A		N/A	N/A				
Ground	<]	<]		<0.01	N/A	N/A				

Note: Xcel Energy has a maximum occupational safety distance of 60" or 5'. The safety distance listed in section 1.1 is based on the reduced power that will produce a compliant site with Xcel Energy policy. The reduced powers are listed in the antenna table in section 3.

The following documents were provided by the client and were utilized to create this report:

RFDS: 215057_CRAN_RUMW_SDALE_005_MRUMW030831_RFDS.052119

CD's: 215057_CRAN_RUMW_SDALE_005_MRUMW030831_CDS REV 0_5.17.2019_

RF Powers Used: Provided by customer

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor & Parapet Info	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access									
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

b. Proposed AT&T Signage

AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access				1101100 2		00010112			Damoro
Point(s)									
Alpha						3			
Beta									
Gamma									
Delta									
Epsilon									

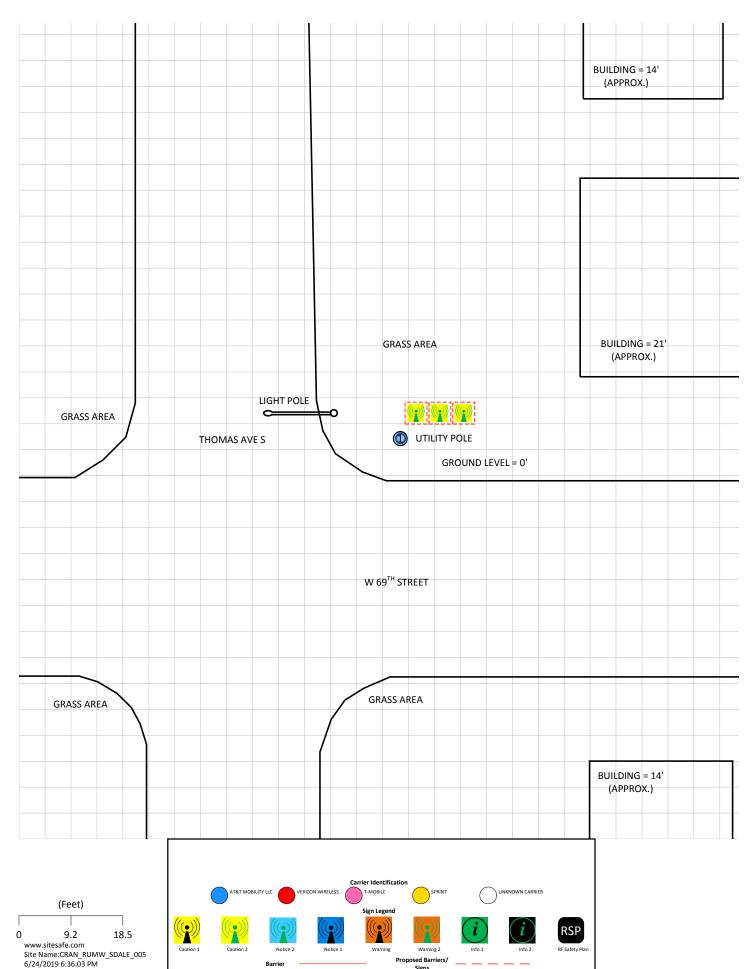


2 Scale Maps of Site

The following diagrams are included:

- J
- J
- Site Scale Map RF Exposure Diagram RF Exposure Diagram Elevation View

Site Scale Map For: CRAN_RUMW_SDALE_005



Signs



3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

NOTE: The powers shown in this antenna table are the maximum reduced power that will produce a compliant site with Xcel Energy policy with a maximum occupational safety distance of 60" or 5'.

Ant ID	Operator	Antenna Make & Model	Туре	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)	Z (AGL)	MDT	EDT
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	51.15	TPO	dBmW	0	1	647.1	6.96	44'	0°	0°
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	51.85	TPO	dBmW	0	1	796.2	7.16	44'	0°	0°
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	28.85	TPO	dBmW	0	1	1.3	2.36	44'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. For other operators at this site the use of "Generic" as an antenna model or "Unknown" for a wireless operator means the information with regard to operator, their FCC license and/or antenna information was not available nor could it be secured while on site. Other operator's equipment, antenna models and powers used for modeling are based on obtained information or Sitesafe experience.

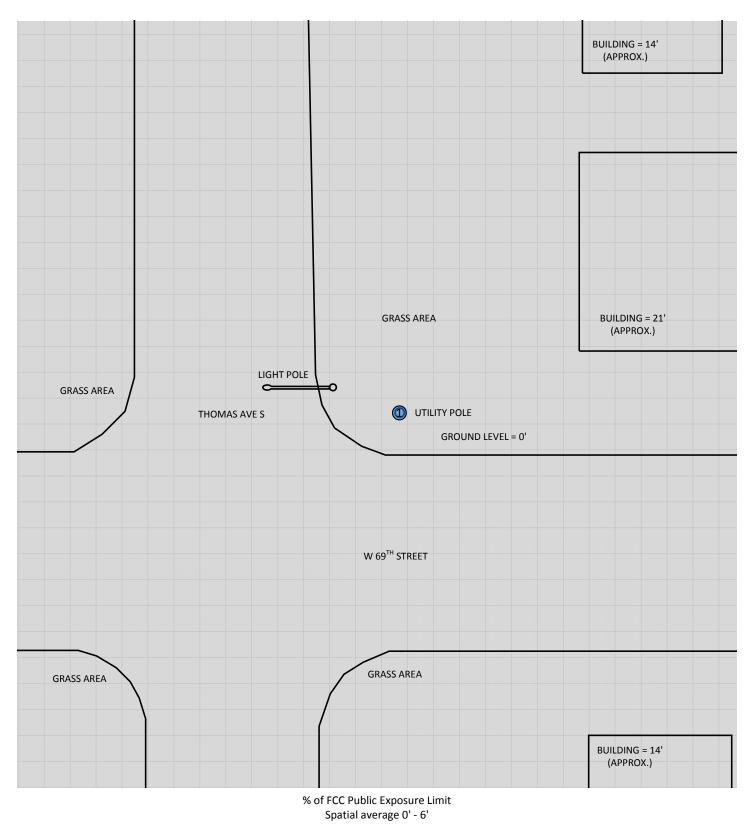


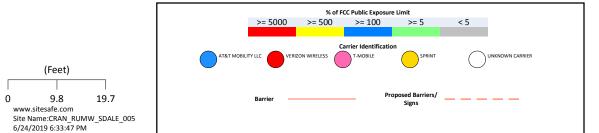
4 Emission Predictions

In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

) Ground Level = 0'
) Building = 14'
) Building = 21'

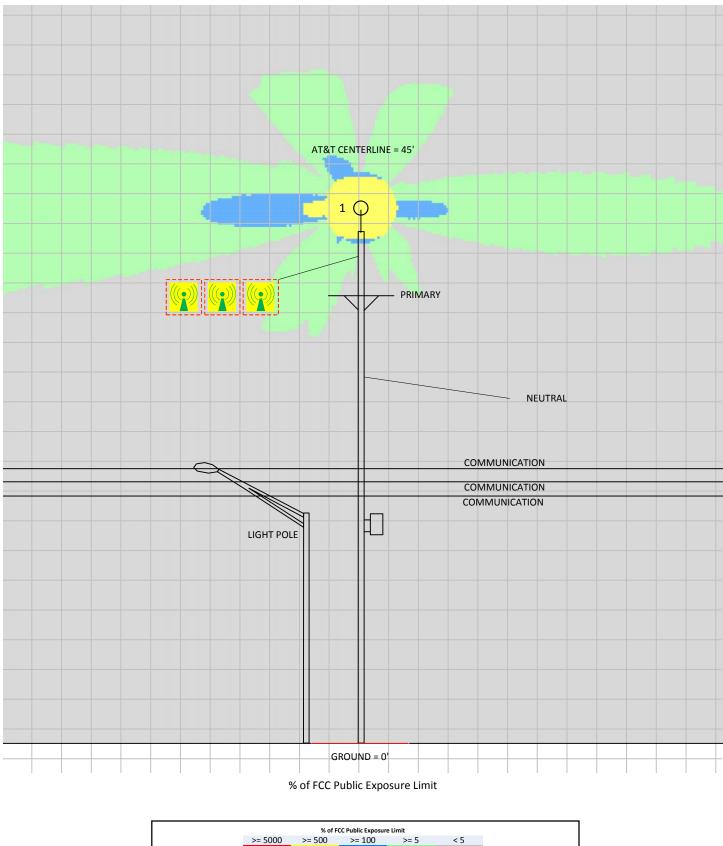
The Antenna Inventory heights are referenced to the same level.

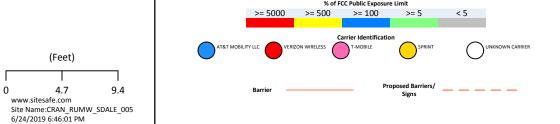




Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Spatially Averaged

RF Exposure Simulation For: CRAN_RUMW_SDALE_005 Elevation View





Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Compliance Remediations

Install three 17.25" x 17.25" Caution 2 signs in triangular format 4' below the antennas. The geometric center of each sign must be positioned at the bottom distance.

The Caution sign text must specify that a distance of 14 feet must be kept from the antenna.

Notes:

-) Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.
-) Any existing signage that conflicts with the proposed signage in this report should be removed per AT&T Signage Posting Rules.



6 **Reviewer Certification**

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Zyotty Thamsil.

June 24, 2019



Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

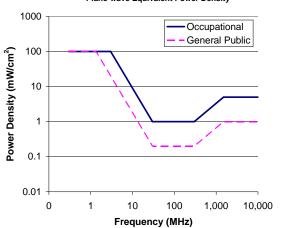
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to accessible areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency	Electric	Magnetic	Power	Averaging Time E ² ,
Range	Field	Field	Density (S)	H ² or S (minutes)
(MHz)	Strength (E)	Strength	(mW/cm²)	
	(V/m)	(H) (A/m)		
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f²)*	6
30-300	61.4	0.163	1.0	6
300-1500			f/300	6
1500-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

	(··· -)											
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,								
Range	Field	Field	Density (S)	H ² or S (minutes)								
(MHz)	Strength (E)	Strength	(mW/cm²)									
	(V/m)	(H) (A/m)										
0.3-1.34	614	1.63	(100)*	30								
1.34-30	824/f	2.19/f	(180/f²)*	30								
30-300	27.5	0.073	0.2	30								
300-1500			f/1500	30								
1500-			1.0	30								
100,000												
f = frequ	ency in MHz	*Plane-wave equivalent power density										

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas:</u> There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

-) Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
-) Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
-) Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. Blue areas should be accessible only to RF trained workers.
- J Yellow represents areas predicted to exceed Occupational MPE limits. Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.
-) Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.



Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) - The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph risk/committees/04 scenihr/docs/scenihr o 022,pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf

SITESAFE

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SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826475 USID – 217402 Site Name – CRAN_RUMW_ GALCT_002 (MRUMW027852-MRUMW030143)

500 WEST 71ST STREET RICHFIELD, MN 55423

Latitude: N44-52-28.27 Longitude: W93-17-09.15 Structure Type: Utility Pole

Report generated date: May 1, 2019 Report by: Zyotty Thamsil Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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1 General Site Summary

1.1 Report Summary

AT&T Mobil	ity, LLC		Summary							
Max Cumu	lative Simulated RFE Le	evel on the Ground	<1% General Public Limit							
Compliant	per FCC Rules and Reg	julations?	Will I	Be Compliant						
Compliant	per AT&T Mobility, LLC'	s Policy?	No							
Maximum Permissible Exposure (MPE) Summary										
% of FCC General % of FCC Location Public/Uncontrolled Occupational/Control Exposure Limit Exposure Limit Exposure Limit				Power Density (mW/cm²)	Occupational Approach Distance (in)	General Public Approach Distance (in)				
	•	Proposed Ec	quipm	nent	-					
Antenna Face Level	3,709.9	742.0		37.1	60"	168''				
UE Relay Level	N/A	N/A		N/A	N/A	N/A				
Ground	Ground <1 <1				N/A	N/A				

The following documents were provided by the client and were utilized to create this report:

RFDS: 217402_CRAN_RUMW_GALCT_002_MRUMW030143_RFDS.041719

CD's: 217402_CRAN_RUMW_GALCT_002_MRUMW030143_CDs REV A Consolidated Redlines.042219

RF Powers Used: Provided by customer

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor & Parapet Info	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations		INFORMATION	Notice	HECCO		CALITION	Postering		M
-	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access									
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon							<u></u>		

b. Proposed AT&T Signage

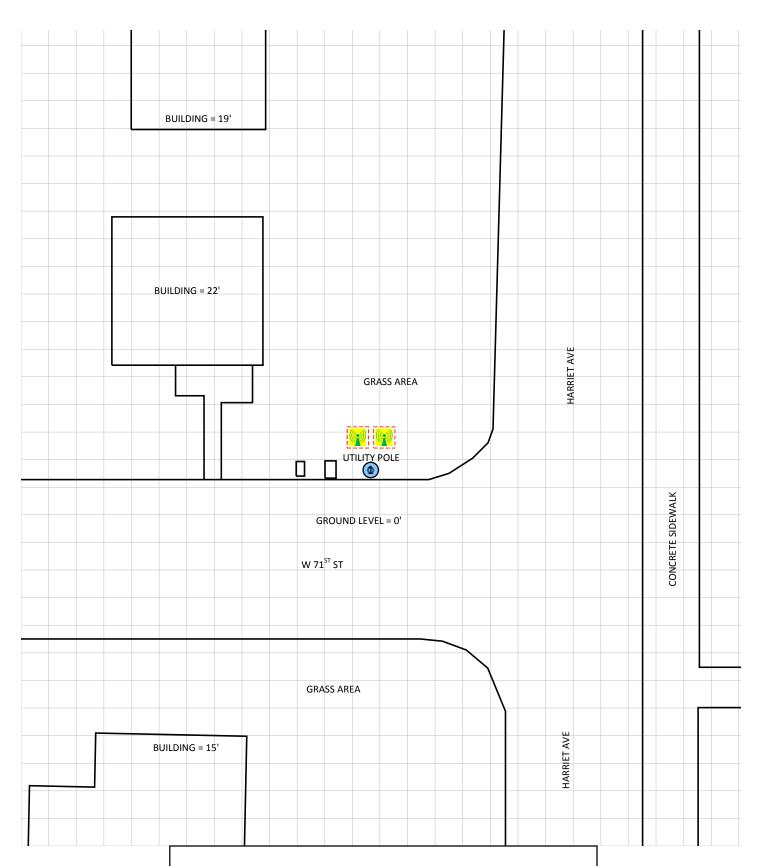
AT&T Signage Locations		INFORMATION	Notice	Notice	CAUTION		Postorius:		
	Information 1	Information 1 Information 2		Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access						2			
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

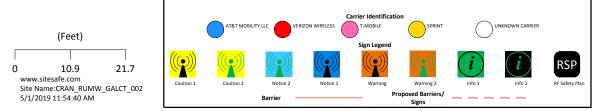


Scale Maps of Site 2

The following diagrams are included:

- Site Scale Map
- Ĵ
- RF Exposure Diagram RF Exposure Diagram Elevation View







3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

NOTE: The powers shown in this antenna table are the maximum reduced power that will produce a compliant site with Xcel Energy policy with a maximum occupational safety distance of 60" or 5'.

Ant ID	Operator	Antenna Make & Model	Туре	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit		TX Count	Total ERP (Watts)	Ant Gain (dBd)	Z (AGL)	MDT	EDT
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	51.15	TPO	dBmW	0	1	647.1	6.96	44'	0°	0°
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	51.85	TPO	dBmW	0	1	796.2	7.16	44'	0°	0°
1	AT&T MOBILITY LLC (PROPOSED)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	28.85	TPO	dBmW	0	1	1.3	2.36	44'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. For other operators at this site the use of "Generic" as an antenna model or "Unknown" for a wireless operator means the information with regard to operator, their FCC license and/or antenna information was not available nor could it be secured while on site. Other operator's equipment, antenna models and powers used for modeling are based on obtained information or Sitesafe experience.

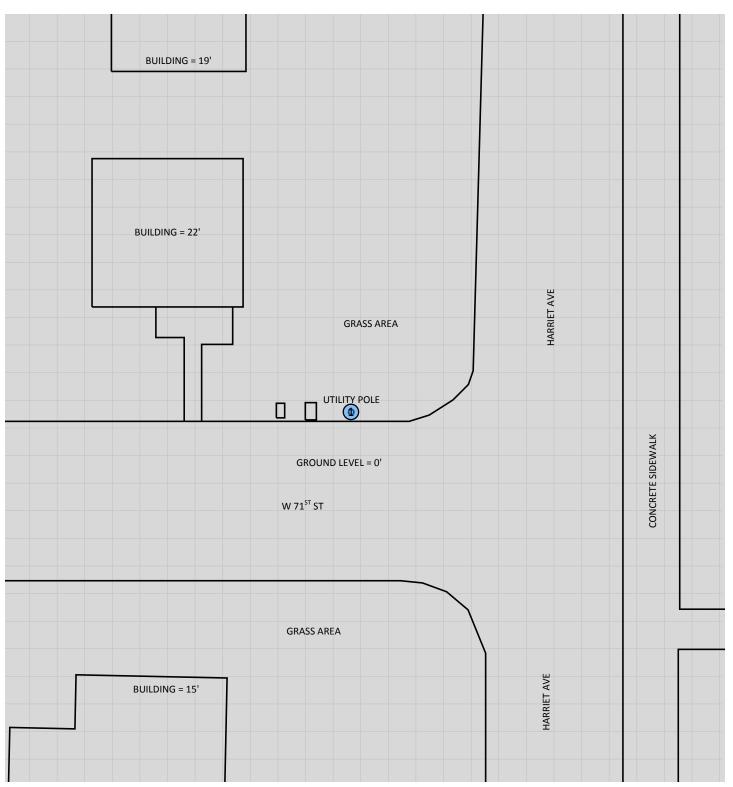


4 Emission Predictions

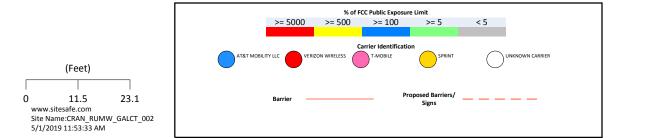
In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

Ground Level = 0'
Building = 15'
Building = 19'
Building = 22'

The Antenna Inventory heights are referenced to the same level.

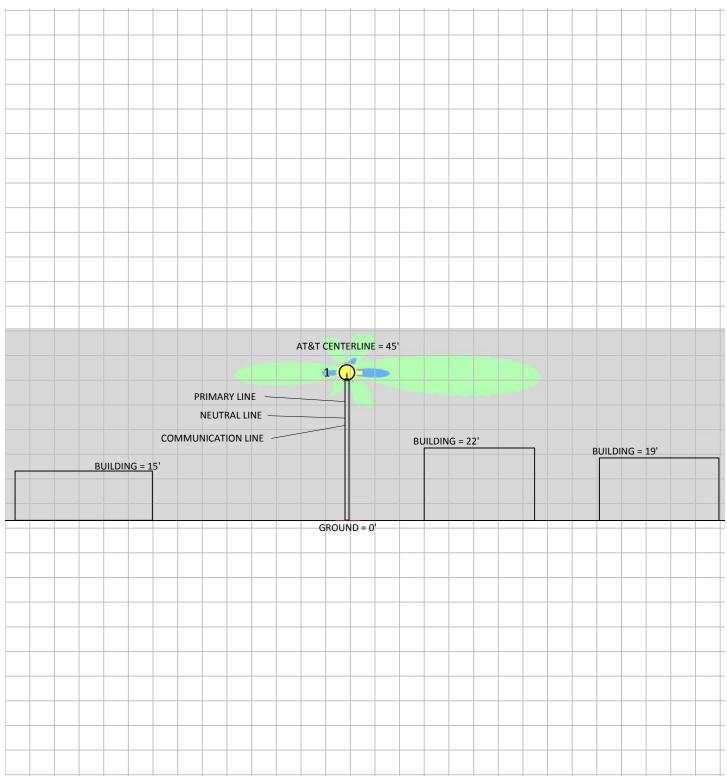


% of FCC Public Exposure Limit Spatial average 0' - 6'

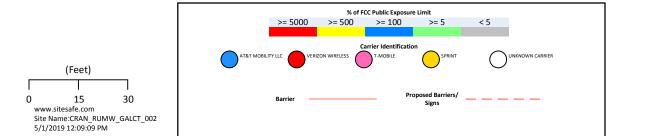


Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Spatially Averaged

RF Exposure Simulation For: CRAN_RUMW_GALCT_002 Elevation View



% of FCC Public Exposure Limit



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Utility Pole Access Location

Place 2 Caution (17.25" x 17.25") signs opposite each other on the mounting structure (e.g., pole) 4' below the bottom tip of the antenna. The top of each sign must be positioned at the bottom distance.

Notes:

-) This report's diagrams do not show the Access locations because the data provided did not include them.
-) Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.
- Any existing signage that conflicts with the proposed signage in this report should be removed per AT&T Signage Posting Rules.



6 **Reviewer Certification**

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Zyotty Thamsil.

<u>May 1, 2019</u>



Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

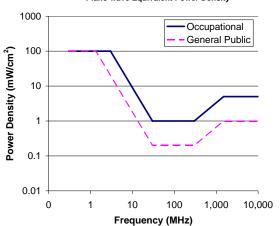
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to accessible areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency	Electric	Magnetic	Power	Averaging Time E ² ,
Range	Field	Field	Density (S)	H ² or S (minutes)
(MHz)	Strength (E)	Strength	(mW/cm²)	
	(V/m)	(H) (A/m)		
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f²)*	6
30-300	61.4	0.163	1.0	6
300-1500			f/300	6
1500-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

Linnes								
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,				
Range	Field	Field	Density (S)	H ² or S (minutes)				
(MHz)	Strength (E)	Strength	(mW/cm²)					
	(V/m)	(H) (A/m)						
0.3-1.34	614	1.63	(100)*	30				
1.34-30	824/f	2.19/f	(180/f²)*	30				
30-300	27.5	0.073	0.2	30				
300-1500			f/1500	30				
1500-			1.0	30				
100,000								
f = frequency in MHz		*Plane-wave equivalent power density						

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas:</u> There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

-) Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
-) Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
-) Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. Blue areas should be accessible only to RF trained workers.
-) Yellow represents areas predicted to exceed Occupational MPE limits. Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.
-) Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.



Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) - The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph risk/committees/04 scenihr/docs/scenihr o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf

®

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SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826478 USID – 217097 Site Name – CRAN_RUMW_GALCT_005 (MRUMW030146)

1701 WEST 71ST STREET RICHFIELD, MN 55423

Latitude: N44-52-27.88 Longitude: W93-18-03.74 Structure Type: Light Pole

Report generated date: May 3, 2019 Report by: Yasir Alqadhili Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the	9,890.0% General Public Limit at antenna level
Antenna Level	
Max Cumulative Simulated RFE Level on the	<1% General Public Limit
Ground	
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: 217097_CRAN_RUMW_GALCT_005_MRUMW030146_RFDS 4.16.19

CD's: 217097_CRAN_RUMW_GALCT_005_MRUMW030146_ CDs REV 0

RF Powers Used: Provided by customer

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor & Parapet Info	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Roof Safety Info	N	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warping 2	Barriers
Access			NUILE	NOTICE 2	Cabilon	COMONY	warning	Warning 2	Bamers
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

Note: No Previous site visit by SiteSafe.

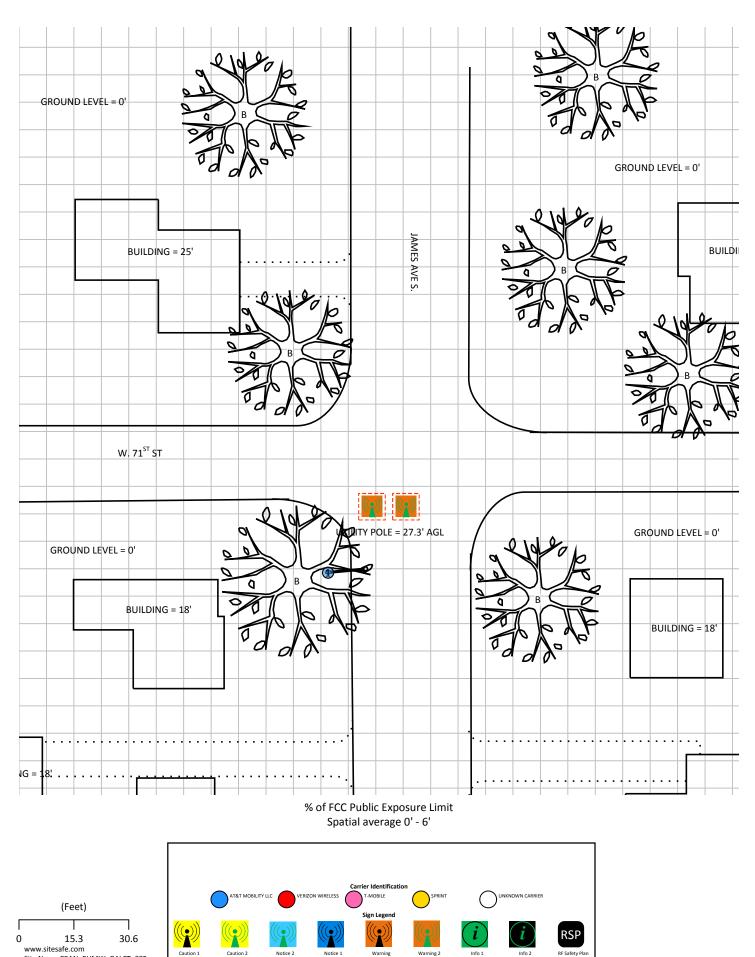
	b. Proposed A	AT&T Signage							
AT&T Signage Locations		INFORMATION	Notice	HOSSE	CAUTION	CALITION			
	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access								2	
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									



2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map J
- Ĵ
- RF Exposure Diagram RF Exposure Diagram Elevation View



Site Name:CRAN_RUMW_GALCT_005 5/3/2019 5:27:51 PM

Caution 1

Caution 2

Notice 2

Barrier

Notice 1

Warning

Warning 2

Proposed Barriers/

Signs

Info 1

Î



3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model		TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)		Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)	Z	MDT	EDT
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	57.25	TPO	dBmW	0	1	2636.3	6.96	22.8'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	57.95	TPO	dBmW	0	1	3243.4	7.16	22.8'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	34.95	TPO	dBmW	0	1	5.4	2.36	22.8'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. For other operators at this site the use of "Generic" as an antenna model or "Unknown" for a wireless operator means the information with regard to operator, their FCC license and/or antenna information was not available nor could it be secured while on site. Other operator's equipment, antenna models and powers used for modeling are based on obtained information or Sitesafe experience.

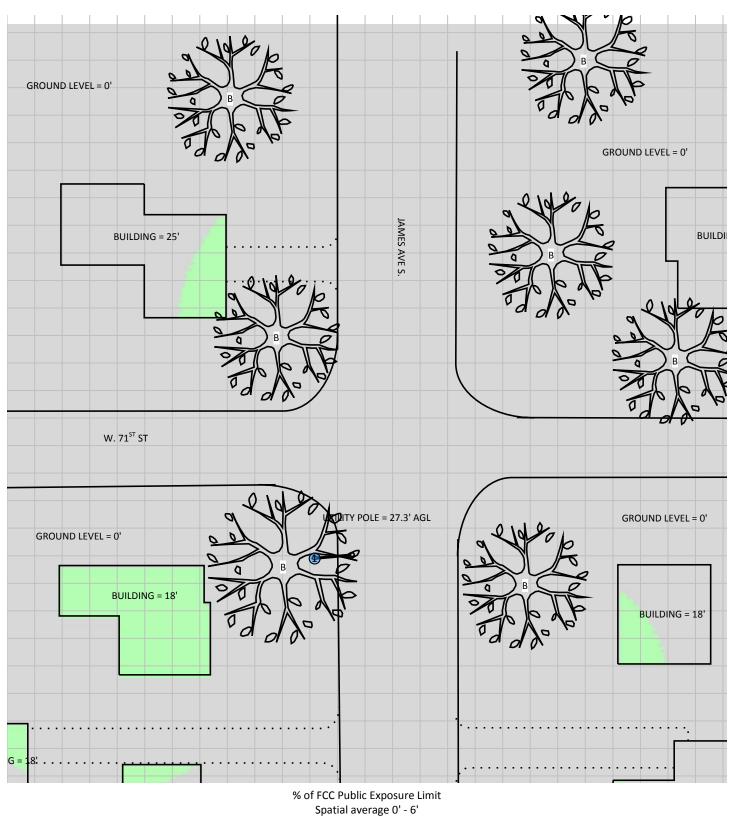


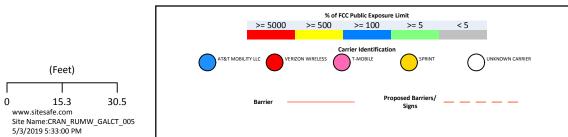
4 Emission Predictions

In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

J GROUND LEVEL = 0'
J BUILDING = 18'
J BUILDING = 25'

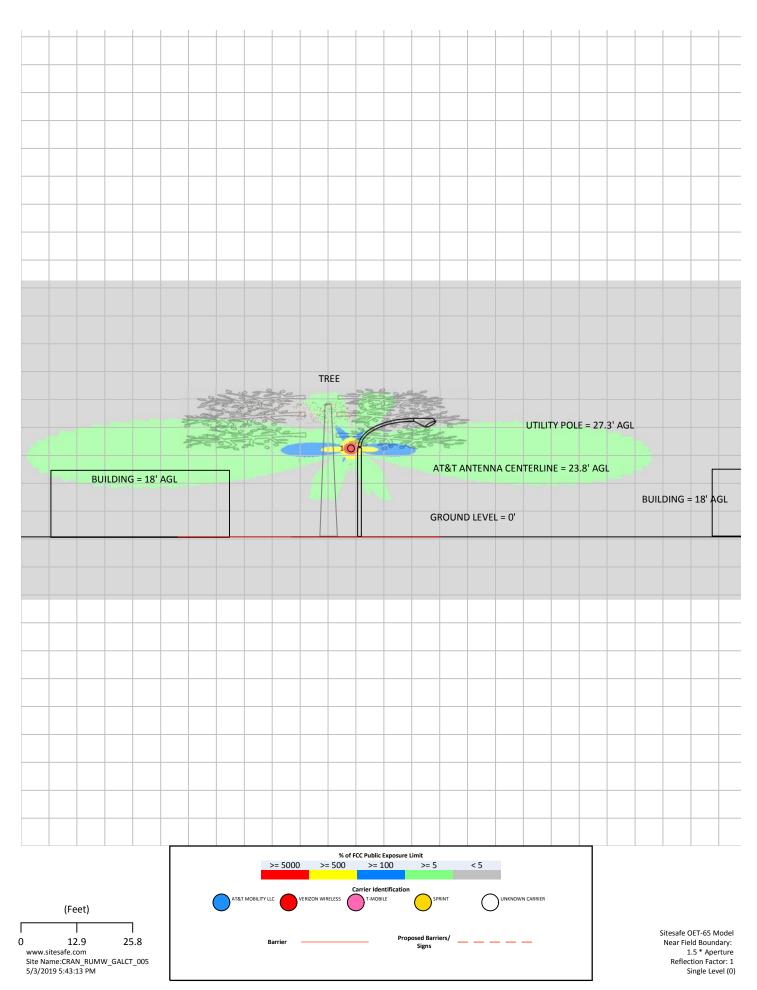
The Antenna Inventory heights are referenced to the same level.





Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)

RF Exposure Simulation For: CRAN_RUMW_GALCT_005 Elevation View - North





5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Option 1:

Utility Pole Access Location

-) Place 2 Warning 2 signs opposite each other on the mounting structure (pole) 6' below the bottom tip of the antenna. The top of each sign must be positioned at the bottom distance.
- Notification letter to the homeowner(s) of the potential for exposure limits to be exceeded in elevated parts of the tree at the antenna level and if any work needs to be completed where someone would be working on the tree at antenna level then ATT should be notified prior to any work starting so they can power down the antenna(s).

Option 2:

Utility Pole Access Location

- Place 2 Warning 2 signs opposite each other on the mounting structure (pole) 6' below the bottom tip of the antenna. The top of each sign must be positioned at the bottom distance.
-) Work with the homeowner to cut the tree down.

Option 3:

) SiteSafe recommends reducing the power deployed at the antenna to reach At&T roles and achieve the 16' SD role.

Option 4:

) SiteSafe recommends moving the antenna to a different pole.



Notes:

-) The area with the potential to exceed the General Public MPE limits is extends beyond 16' from the antenna. Sitesafe would normally recommend the appropriate RF signage on the structure at the vertical safe distance below the antenna; however, per AT&T's signage policy, no signage should be recommended in this instance and controlled access to the structure should be implemented by AT&T and the structure owner.
-) AT&T Mobility, LLC will determine the appropriate signage size for the 27' Safety Distance.
-) Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.
-) Any existing signage that conflicts with the proposed signage in this report should be removed per AT&T Signage Posting Rules.



6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Yasir Alqadhili.

<u>May 3, 2019</u>



Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

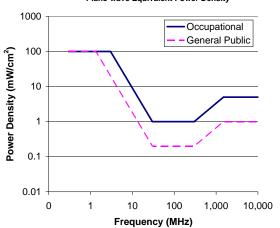
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to accessible areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency	Electric	Magnetic	Power	Averaging Time E ² ,
Range	Field	Field	Density (S)	H ² or S (minutes)
(MHz)	Strength (E)	Strength	(mW/cm²)	
	(V/m)	(H) (A/m)		
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f²)*	6
30-300	61.4	0.163	1.0	6
300-1500			f/300	6
1500-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

Ennes								
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,				
Range	Field	Field	Density (S)	H ² or S (minutes)				
(MHz)	Strength (E)	Strength	(mW/cm²)					
	(V/m)	(H) (A/m)						
0.3-1.34	614	1.63	(100)*	30				
1.34-30	824/f	2.19/f	(180/f²)*	30				
30-300	27.5	0.073	0.2	30				
300-1500			f/1500	30				
1500-			1.0	30				
100,000								
f = frequ	f = frequency in MHz		*Plane-wave equivalent power density					

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas:</u> There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

-) Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
-) Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
-) Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. Blue areas should be accessible only to RF trained workers.
- J Yellow represents areas predicted to exceed Occupational MPE limits. Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.
-) Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.



Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf

8618 Westwood Center Drive, Suite 315, Vienna, VA 22182 703.276.1100 • 703.276.1169 fax info@sitesafe.com • www.sitesafe.com



SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA - 14826480 **USID - 217099** Site Name – CRAN_RUMW_GALCT_007 **MRUMW030157**

7116 LYNDALE AVE. SOUTH **RICHFIELD, MN 55423**

Latitude: N44-52-21.83 Longitude: W93-17-18.71 Structure Type: Light Pole

R

SITESAFE

Report generated date: May 6, 2019 Report by: Yasir Algadhili Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the	<1% General Public Limit
Ground	
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: 217099_CRAN_RUMW_GALCT_007_MRUMW030157_RFDS 4.16.19

CD's: 217099_CRAN_RUMW_GALCT_007_MRUMW030157_ CDs REV 0

RF Powers Used: Provided by customer

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor & Parapet Info	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations		INFORMATION	Nacion	Nation	CAUTION	CAUTION			M
Accoss	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access									
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

Note: No Previous site visit by SiteSafe.

	b. Proposed A	AT&T Signage							
AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access			Nonee	TROLLEG Z	Cabilon	Cuonorrz	warning	Warning 2	Damers
Point(s)			-						
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

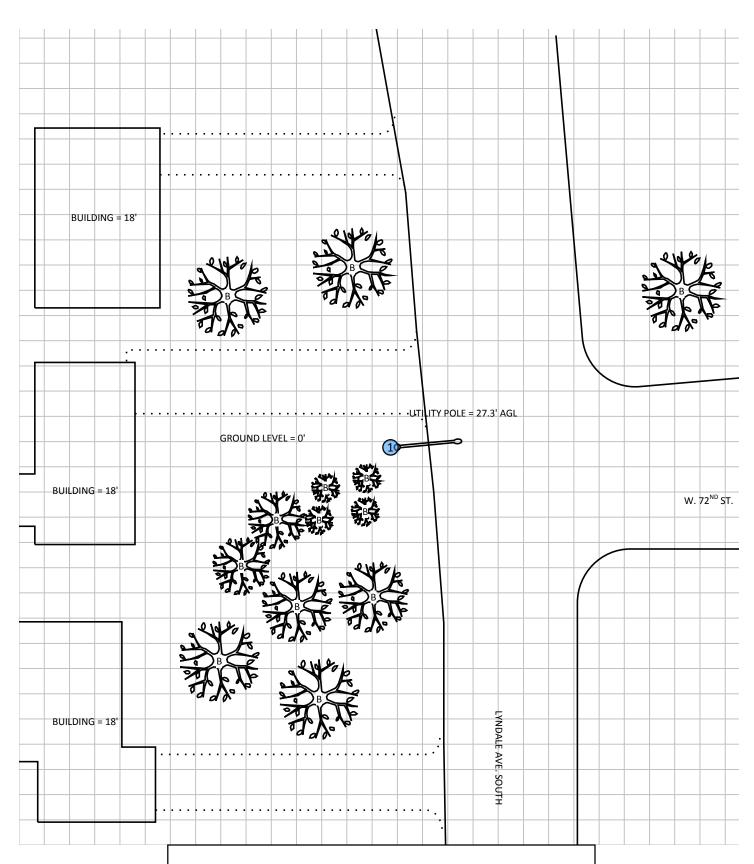


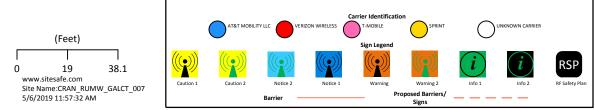
2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map J
- Ĵ
- RF Exposure Diagram RF Exposure Diagram Elevation View

Site Scale Map For: CRAN_RUMW_GALCT_007







3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model	Туре	TX Freq (MHz)		Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss			Ant Gain (dBd)	Z (AGL)	MDT	EDT
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	57.25	TPO	dBmW	0		2636.3	6.96	22.8'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	57.95	TPO	dBmW	0	1	3243.4	7.16	22.8'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	34.95	TPO	dBmW	0	1	5.4	2.36	22.8'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. For other operators at this site the use of "Generic" as an antenna model or "Unknown" for a wireless operator means the information with regard to operator, their FCC license and/or antenna information was not available nor could it be secured while on site. Other operator's equipment, antenna models and powers used for modeling are based on obtained information or Sitesafe experience.

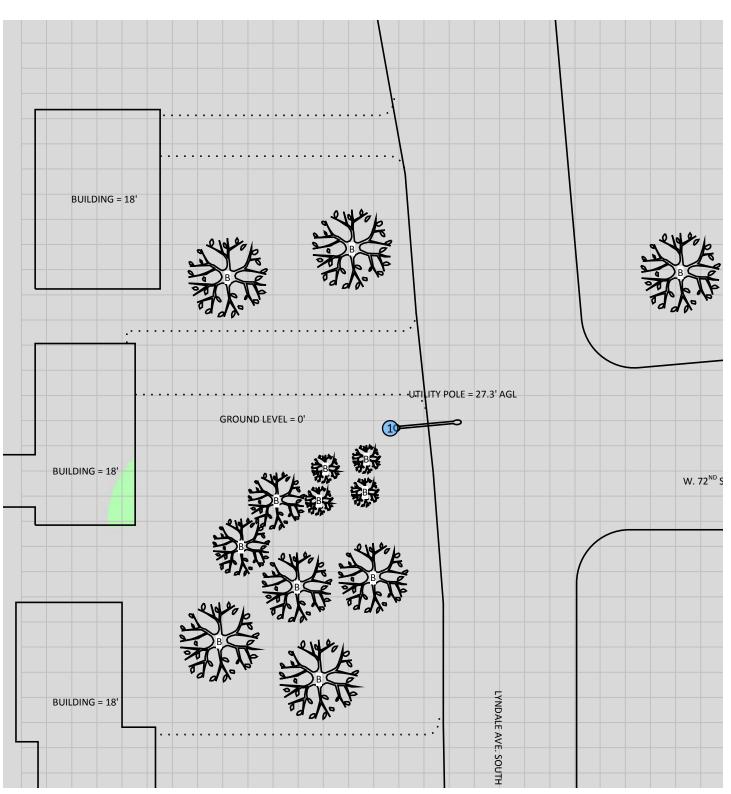


4 Emission Predictions

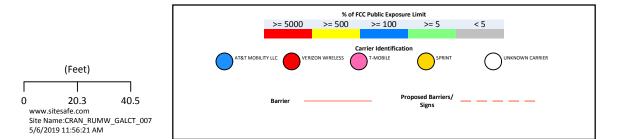
In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

GROUND LEVEL = 0'BUILDING = 18'

The Antenna Inventory heights are referenced to the same level.



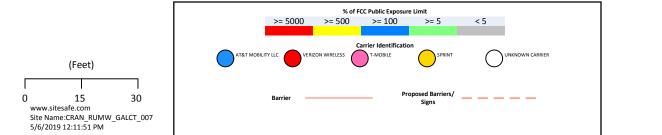
% of FCC Public Exposure Limit Spatial average 0' - 6'



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)

RF Exposure Simulation For: CRAN_RUMW_GALCT_007 Elevation View - North

			UTILITY POLE = 27.3' AGL
	AT&T ANTENN	A CENTERLINE = 23.8' AGL	
BUILDING = 18' AGL			
BUILDING = 18' AGL		GROUND LI	
BUILDING = 18' AGL		Normal Normal<	
BUILDING = 18' AGL		Normal Normal<	
BUILDING = 18' AGL		Normal Normal<	
BUILDING = 18' AGL	Image: select	Normal Normal<	
BUILDING = 18' AGL		Normal Normal<	
BUILDING = 18' AGL BUILDING = 18' AGL BUILDING = 18' AGL Image: Stress of the s		Normal Normal<	
BUILDING = 18' AGL		Normal Normal<	



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Light Pole Access Location

No Signs - Controlled access to the structure should be implemented by AT&T and the structure owner.

Notes:

-) The area with the potential to exceed the General Public MPE limits is extends beyond 16' from the antenna. Sitesafe would normally recommend the appropriate RF signage on the structure at the vertical safe distance below the antenna; however, per AT&T's signage policy, no signage should be recommended in this instance and controlled access to the structure should be implemented by AT&T and the structure owner.
-) MPE is calculated to be 11,319.24 at the antenna level and MPE safe Distance is 27' Horizontal and 4' vertical.
-) Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.



6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Yasir Alqadhili.

<u>May 6, 2019</u>



Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

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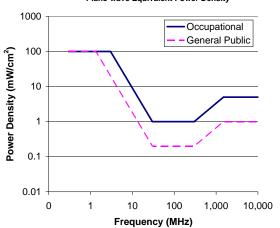
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An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency	Electric	Magnetic	Power	Averaging Time E ² ,		
Range	Field	Field	Density (S)	H ² or S (minutes)		
(MHz)	Strength (E)	Strength	(mW/cm²)			
	(V/m)	(H) (A/m)				
0.3-3.0	614	1.63	(100)*	6		
3.0-30	1842/f	4.89/f	(900/f²)*	6		
30-300	61.4	0.163	1.0	6		
300-1500			f/300	6		
1500-			5	6		
100,000						

Limits for General Population/Uncontrolled Exposure (MPE)

Ennes									
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,					
Range	Field	Field	Density (S)	H ² or S (minutes)					
(MHz)	Strength (E)	Strength	(mW/cm²)						
	(V/m)	(H) (A/m)							
0.3-1.34	614	1.63	(100)*	30					
1.34-30	824/f	2.19/f	(180/f²)*	30					
30-300	27.5	0.073	0.2	30					
300-1500			f/1500	30					
1500-			1.0	30					
100,000									
f = frequ	lency in MHz	*Plane-wave equivalent power density							

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

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Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas:</u> There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

-) Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
-) Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
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-) Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.



Occupational/Controlled Environment - Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) - The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf

SITESAFE



SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826489 USID – 217104 Site Name – CRAN_RUMW_GALCT_001 (MRUMW027858) 7400 NICOLLET AVENUE RICHFIELD, MN 55423

Latitude: N44-52-08.22 Longitude: W93-16-41.99 Structure Type: Light Pole

R

Report generated date: May 3, 2019 Report by: Scott Broyles Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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2 SCALE MAPS OF SITE
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4 EMISSION PREDICTIONS
5 SITE COMPLIANCE
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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the	<1% General Public Limit
Ground	
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: 217104_CRAN_RUMW_GALCT_001_MRUMW027858_ RFDS 4.16.19

CD's: 217104_CRAN_RUMW_GALCT_001_MRUMW027858_REV 0_4.12.2019

RF Powers Used: Customer power used

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor &	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Parapet Info			
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage		INFORMATION				CAUMON	WAINING		M
Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	L L Barriers
Access Point(s)		Information 2	THOREE	NOTICE 2	Cuonori		Warning		Damers
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

b. Proposed AT&T Signage

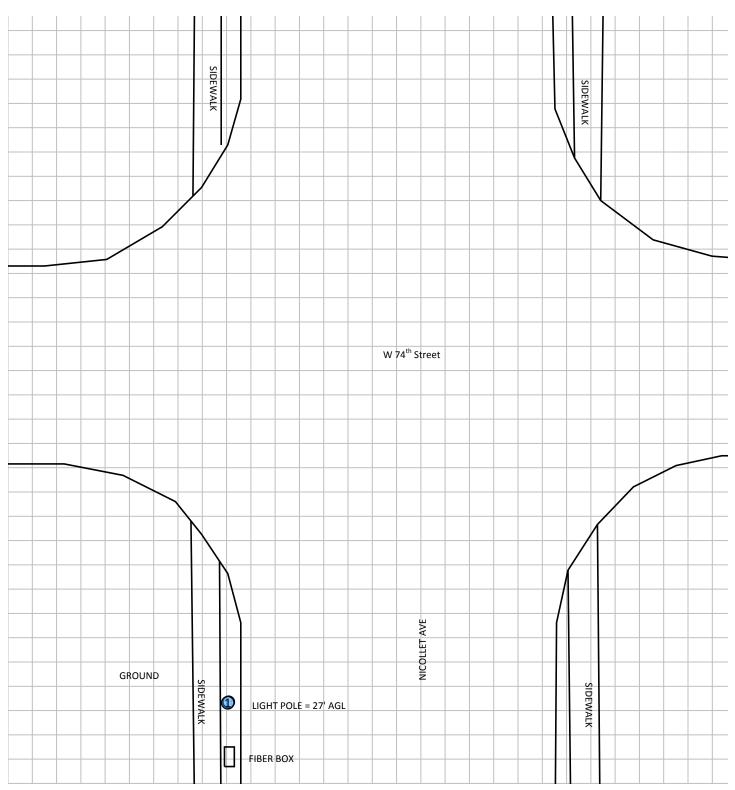
AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access							-		
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									



2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map
- RF Exposure Diagram
- RF Exposure Diagram Elevation View



% of FCC Public Exposure Limit Spatial average 0' - 6'





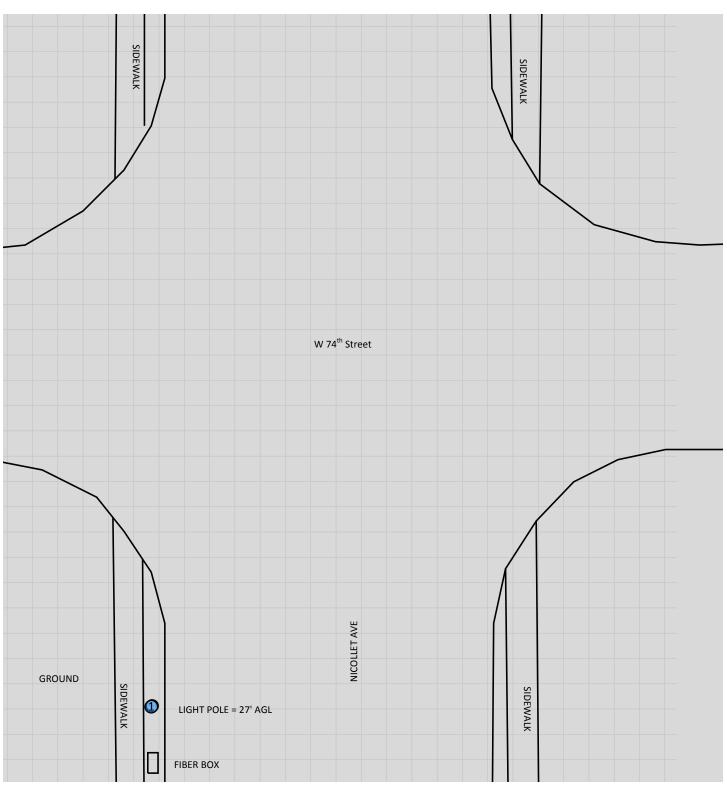
4 **Emission Predictions**

In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

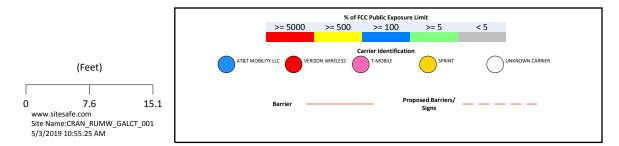
• Ground = 0'

The Antenna Inventory heights are referenced to the same level.

RF Exposure Simulation For: CRAN_RUMW_GALCT_001 Composite View

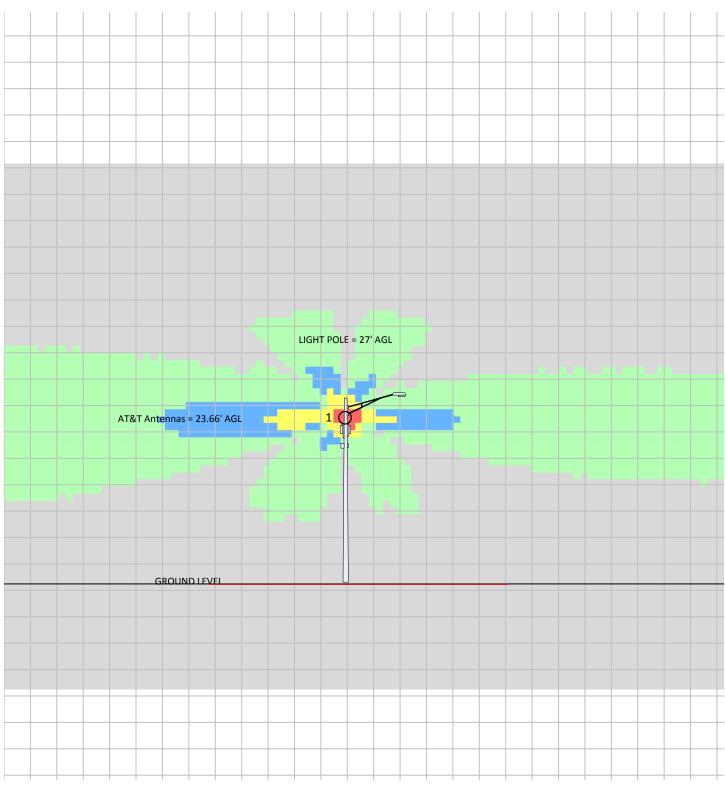


% of FCC Public Exposure Limit Spatial average 0' - 6'

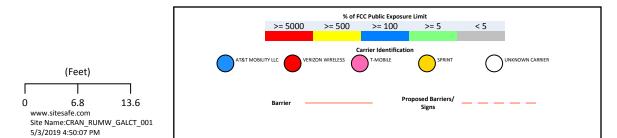


Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Spatially Averaged

RF Exposure Simulation For: CRAN_RUMW_GALCT_001 Elevation View



% of FCC Public Exposure Limit Spatial average 0' - 6'



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Light Pole Access Location

No Signs - Controlled access to the structure should be implemented by AT&T and the structure owner.

Notes:

- The area with the potential to exceed the General Public MPE limits is extends beyond 16' from the antenna. Sitesafe would normally recommend the appropriate RF signage on the structure at the vertical safe distance below the antenna; however, per AT&T's signage policy, no signage should be recommended in this instance and controlled access to the structure should be implemented by AT&T and the structure owner.
- MPE is calculated to be 15,113.26 at the antenna level and MPE safe Distance is 27' Horizontal and 4' vertical.
- Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.



6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Scott Broyles.

<u>May 3, 2019</u>



Appendix A - Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B - Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

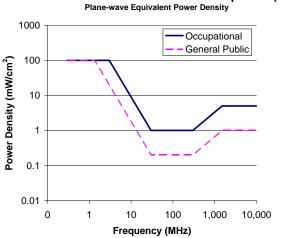
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:







Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E)	Magnetic Field Strength	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
	(V/m)	(H) (A/m)		
	(•/111)			
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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-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

,,								
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,				
Range	Field	Field	Density (S)	H ² or S (minutes)				
(MHz)	Strength (E)	Strength	(mW/cm²)					
	(V/m)	(H) (A/m)						
0.3-1.34	614	1.63	(100)*	30				
1.34-30	824/f	2.19/f	(180/f²)*	30				
30-300	27.5	0.073	0.2	30				
300-1500			f/1500	30				
1500-			1.0	30				
100,000								
f = frequ	uency in MHz	*Plane-wave equivalent power density						

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

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Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

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General Model Assumptions

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The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

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Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.



Appendix F – Definitions

5% *Rule* – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

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OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health

http://www.fhi.no/dokumenter/545eea7147.pdf

SITE SAFE

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SAC Wireless, LLC on behalf of AT&T Mobility, LLC Site FA – 14826409 USID – 215058 Site Name – CRAN_RUMW_SDALE_007 (MRUMW030816) 7444 SOUTH UPTON AVENUE RICHFIELD, MN 55423

Latitude: N44-52-02.68 Longitude: W93-18-54.22 Structure Type: Light Pole

R

Report generated date: May 3, 2019 Report by: Scott Broyles Customer Contact: Ryan Peck

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the	<1% General Public Limit
Ground	
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: 215058_CRAN_RUMW_SDALE_007_MRUMW030816_RFDS 4.16.19

CD's: 215058_CRAN_RUMW_SDALE_007_MRUMW030816_ CDS REV 0

RF Powers Used: Client Provided Powers

1.2 Fall Arrest Anchor Point Summary

Fall Arrest Anchor &	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Parapet Info			
Roof Safety Info	Ν	N/A	Ν



1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access		Information 2	NUICE	NOTICE 2	Cuolion	COUNT	waining	wanning z	Damers
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

b. Proposed AT&T Signage

AT&T Signage Locations		INFORMATION	Hotoe		CAUTION	CALITION	WARMING Path	WARNING	M M M
	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access									
Point(s)									
Alpha									
Beta									
Gamma									
Delta									
Epsilon									

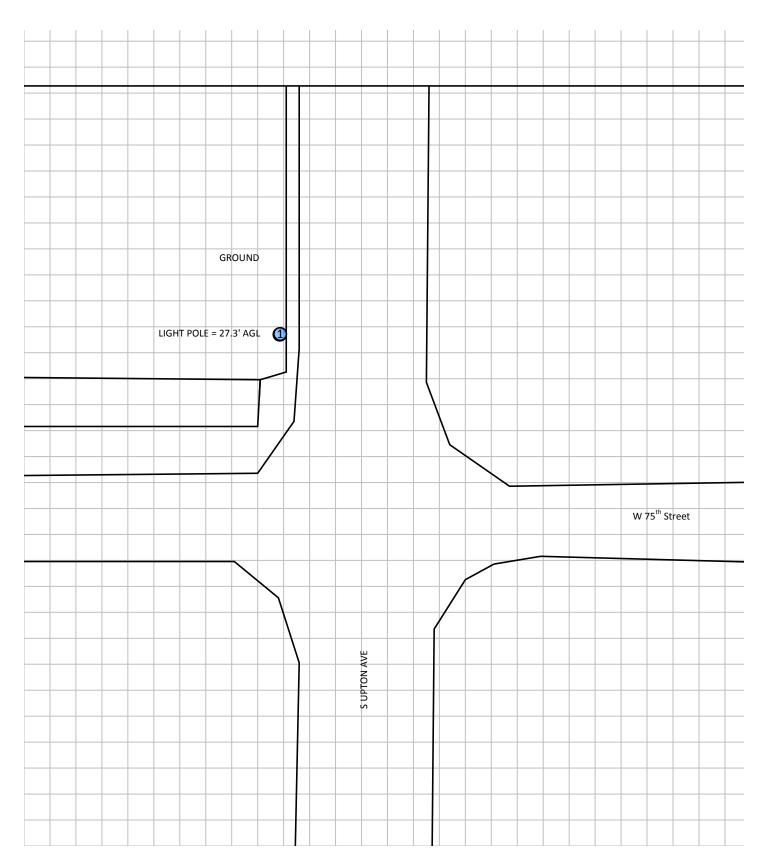


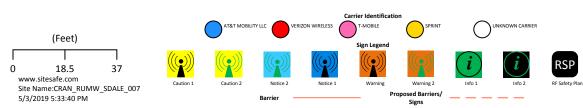
2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map
- RF Exposure Diagram
- RF Exposure Diagram Alpha Sector Elevation View

Site Scale Map For: CRAN_RUMW_SDALE_007







3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model	Туре	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)		MDT	EDT
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	1900	LTE	0	360	2	57.25	TPO	dBmW	0	1	2636.3	6.96	40.3'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	2100	LTE	0	360	2	57.95	TPO	dBmW	0	1	3243.4	7.16	40.3'	0°	0°
1	AT&T MOBILITY LLC (Proposed)	Ace Technology ACOM-2F15D-12P	Omni	5150	LTE	0	360	2	34.95	TPO	dBmW	0	1	5.4	2.36	40.3'	0°	0°

Note: The Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed.



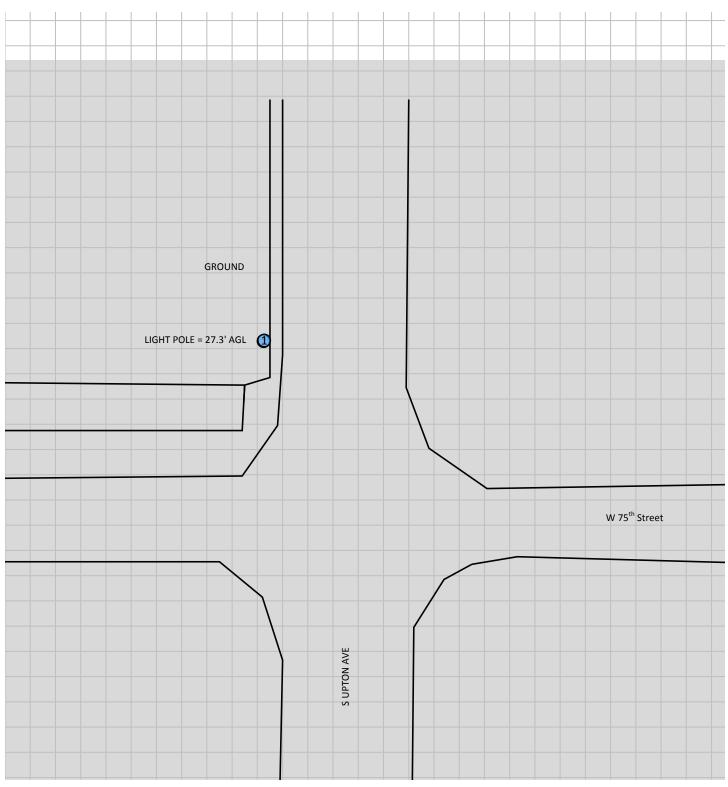
4 **Emission Predictions**

In the RF Exposure Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

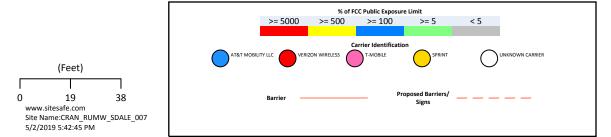
• Ground = 0

The Antenna Inventory heights are referenced to the same level.

RF Exposure Simulation For: CRAN_RUMW_SDALE_007 Composite View

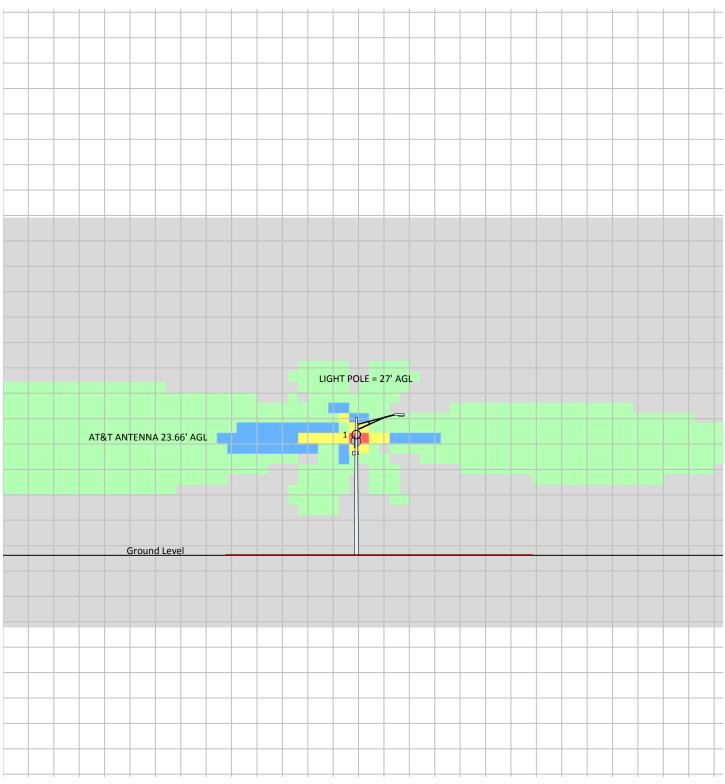


% of FCC Public Exposure Limit Spatial average 0' - 6'

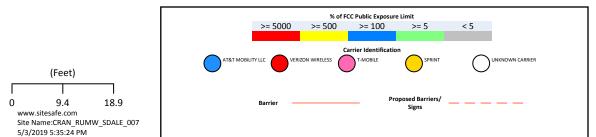


Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Spatially Averaged

RF Exposure Simulation For: CRAN_RUMW_SDALE_007 Elevation View



% of FCC Public Exposure Limit Spatial average 0' - 6'



Sitesafe OET-65 Model Near Field Boundary: 1.5 * Aperture Reflection Factor: 1 Single Level (0)



5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Light Pole Access Location

No Signs - Controlled access to the structure should be implemented by AT&T and the structure owner.

Notes:

- The area with the potential to exceed the General Public MPE limits is extends beyond 16' from the antenna. Sitesafe would normally recommend the appropriate RF signage on the structure at the vertical safe distance below the antenna; however, per AT&T's signage policy, no signage should be recommended in this instance and controlled access to the structure should be implemented by AT&T and the structure owner.
- MPE is calculated to be 15,113.26 at the antenna level and MPE safe Distance is 27' Horizontal and 4' vertical.
- Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.



6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Scott Broyles.

<u>May 3, 2019</u>



Appendix A - Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.



Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

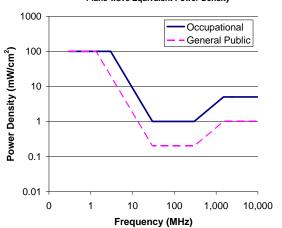
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



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



Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E)	Magnetic Field Strength	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
	(V/m)	(H) (A/m)		
	(•/111)			
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-			5	6
100,000				

Limits for General Population/Uncontrolled Exposure (MPE)

	===============================									
Frequency	Electric	Magnetic	Power	Averaging Time E ² ,						
Range	Field	Field	Density (S)	H ² or S (minutes)						
(MHz)	Strength (E)	Strength	(mW/cm²)							
	(V/m)	(H) (A/m)								
0.3-1.34	614	1.63	(100)*	30						
1.34-30	824/f	2.19/f	(180/f²)*	30						
30-300	27.5	0.073	0.2	30						
300-1500			f/1500	30						
1500-			1.0	30						
100,000										
f = frequ	uency in MHz	*Plane-\	wave equivale	ent power density						

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

- shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
- (2) shall comply with occupational safety and health standards promulgated under this Act.
- (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.



Appendix C - Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

<u>General Maintenance Work</u>: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

<u>RF Signage:</u> Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

<u>Maintain a 3 foot clearance from all antennas</u>: There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access to the antenna locations.



Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

- Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. Gray areas are accessible to anyone.
- Green represents areas are predicted to be between 5% and 100% of the MPE limits. Green areas are accessible to anyone.
- Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. Blue areas should be accessible only to RF trained workers.
- Yellow represents areas predicted to exceed Occupational MPE limits. Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.
- Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. Red indicates that the RF levels must be reduced prior to access. An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.



Appendix E - Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

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Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC http://www.sitesafe.com FCC Radio Frequency Safety http://www.fcc.gov/encyclopedia/radio-frequency-safety National Council on Radiation Protection and Measurements (NCRP) http://www.ncrponline.org Institute of Electrical and Electronics Engineers, Inc., (IEEE) http://www.ieee.org American National Standards Institute (ANSI) http://www.ansi.org Environmental Protection Agency (EPA) http://www.epa.gov/radtown/wireless-tech.html National Institutes of Health (NIH) http://www.niehs.nih.gov/health/topics/agents/emf/ Occupational Safety and Health Agency (OSHA) http://www.osha.gov/SLTC/radiofrequencyradiation/ International Commission on Non-Ionizing Radiation Protection (ICNIRP) http://www.icnirp.org World Health Organization (WHO) http://www.who.int/peh-emf/en/ National Cancer Institute http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones American Cancer Society (ACS) http://www.cancer.org/docroot/PED/content/PED 1 3X Cellular Phone Towers.asp?sit earea=PED European Commission Scientific Committee on Emerging and Newly Identified Health Risks http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o 022.pdf Fairfax County, Virginia Public School Survey http://www.fcps.edu/fts/safety-security/RFEESurvey/ UK Health Protection Agency Advisory Group on Non-Ionizing Radiation http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb C/1317133826368 Norwegian Institute of Public Health http://www.fhi.no/dokumenter/545eea7147.pdf