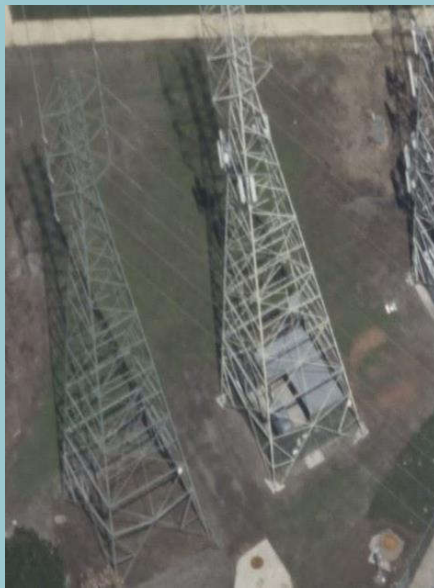


# Radio Frequency - Electromagnetic Energy (RF-EME) Jurisdictional Report

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Site No. SFSFO00570D  
PG&E  
200 Armour Ave  
S. San Francisco, California 94080  
37° 39' 37.93" N, -122° 24' 18.63" W NAD83

EBI Project No. 6222003897  
June 16, 2022



Prepared for:  
Dish Wireless

Prepared by:  
 **EBI Consulting**  
environmental | engineering | due diligence

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REFERENCE DOCUMENTS (NOT ATTACHED)

**CDs:** SFSFO00570D\_PRELIMCD\_20220525135528\_CX REVIEW\_20220526161148

**RFDS:** RFDS-SFSFO00570D-PRELIMINARY-20220516-V.3\_20220516122828

## EXECUTIVE SUMMARY

### Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by Dish Wireless to conduct radio frequency electromagnetic (RF-EME) modeling for Dish Wireless Site SFSFO00570D located at 200 Armour Ave in S. San Francisco, California to determine RF-EME exposure levels from proposed Dish Wireless communications equipment at this site. As described in greater detail in Appendix C of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for the general public and for occupational activities. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

### Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

As presented in the sections below, based on worst-case predictive modeling, there are no modeled areas on any accessible ground-level walking/working surface related to the proposed antennas that exceed the FCC's occupational or general public exposure limits at this site. Additionally, there are areas where workers who may be elevated above the ground may be exposed to power densities greater than the occupational limits. Therefore, workers should be informed about the presence and locations of antennas and their associated fields.

At the nearest walking/working surfaces to the Dish Wireless antennas, the maximum power density generated by the DISH antennas is approximately **0.25** percent of the FCC's general public limit (**0.05** percent of the FCC's occupational limit).

The composite exposure level from all carriers on this site is approximately **0.25** percent of the FCC's general public limit (**0.05** percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna.

Recommended control measures are outlined in Section 4.0 and within the Site Safety Plan (attached); Dish Wireless should also provide procedures to shut down and lockout/tagout this wireless equipment in accordance with their own standard operating protocol. Non-telecom workers who will be working in areas of exceedance are required to contact Dish Wireless since only DISH has the ability to lockout/tagout the facility, or to authorize others to do so.

## 1.0 INTRODUCTION

Radio frequency waves are electromagnetic waves from the portion of the electromagnetic spectrum at frequencies lower than visible light and microwaves. The wavelengths of radio waves range from thousands of meters to around 30 centimeters. These wavelengths correspond to frequencies as low as 3 cycles per second (or hertz [Hz]) to as high as one gigahertz (one billion cycles per second).

Personal Communication (PCS) facilities used by Dish Wireless in this area will potentially operate within a frequency range of 600 to 5000 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed a distance above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of in areas in the immediate vicinity of the antennas.

MPE limits do not represent levels where a health risk exists, since they are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size or health.

## 2.0 SITE DESCRIPTION

This project site includes the following proposed wireless telecommunication antennas on a transmission tower located at 200 Armour Ave in S. San Francisco, California.

Ant #	Operator	Antenna Make	Antenna Model	Frequency (MHz)	Azimuth (deg.)	Mechanical Downtilt (deg.)	Horizontal Beamwidth (Degrees)	Aperture (feet)	Total Power Input (Watts)	Gain (dBd)*	Total ERP (Watts)	Total EIRP (Watts)
1	Dish	JMA	MX08FRO665-21 02DT 600	600	40	0	62	6.0	120	11.35	1459.42	2393.45
1	Dish	JMA	MX08FRO665-21 02DT 2000	2000	40	0	61	6.0	160	15.75	5359.45	8789.49
1	Dish	JMA	MX08FRO665-21 02DT 2100	2100	40	0	65	6.0	160	16.75	6747.14	11065.32
2	Dish	JMA	MX08FRO665-21 02DT 600	600	160	0	62	6.0	120	11.35	1459.42	2393.45
2	Dish	JMA	MX08FRO665-21 08DT 2000	2000	160	0	60	6.0	160	15.95	5612.03	9203.73
2	Dish	JMA	MX08FRO665-21 08DT 2100	2100	160	0	64	6.0	160	16.55	6443.47	10567.29
3	Dish	JMA	MX08FRO665-21 02DT 600	600	280	0	62	6.0	120	11.35	1459.42	2393.45
3	Dish	JMA	MX08FRO665-21 02DT 2000	2000	280	0	61	6.0	160	15.75	5359.45	8789.49
3	Dish	JMA	MX08FRO665-21 02DT 2100	2100	280	0	65	6.0	160	16.75	6747.14	11065.32

• Note there is 1 Dish Wireless antenna per sector at this site. For clarity, the different frequencies for each antenna are entered on separate lines.

Ant #	NAME	X	Y	Antenna Radiation Centerline	Z-Height Lowest Power Line	Z-Height Ground
1	Dish	13.1	63.8	57.0	-6.0	57.0
2	Dish	7.9	42.9	57.0	-6.0	57.0
3	Dish	0.3	56.0	57.0	-6.0	57.0

• Note the Z-Height represents the distance from the antenna centerline in feet.

The above tables contain an inventory of proposed Dish Wireless antennas and other carrier antennas if sufficient information was available to model them. Note that EBI uses an assumed set of antenna specifications and powers for unknown and other carrier antennas for modeling purposes. The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general public that may be exposed to antenna fields. While access to this site is considered uncontrolled, the analysis has considered exposures with respect to both controlled and uncontrolled limits as an untrained worker may access adjacent rooftop locations. Additional information regarding controlled/uncontrolled exposure limits is provided in Appendix C. Appendix B presents a site safety plan that provides a plan view of the transmission tower with antenna locations.

### **3.0 WORST-CASE PREDICTIVE MODELING**

EBI has performed theoretical MPE modeling using RoofMaster™ software to estimate the worst-case power density at the site's nearby broadcast levels resulting from operation of the antennas. RoofMaster™ is a widely-used predictive modeling program that has been developed by Waterford Consultants to predict RF power density values for rooftop and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. Using the computational methods set forth in Federal Communications Commission (FCC) Office of Engineering & Technology (OET) Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (OET-65), RoofMaster™ calculates predicted power density in a scalable grid based on the contributions of all RF sources characterized in the study scenario. At each grid location, the cumulative power density is expressed as a percentage of the FCC limits. Manufacturer antenna pattern data is utilized in these calculations. RoofMaster™ models consist of the Far Field model as specified in OET-65 and an implementation of the OET-65 Cylindrical Model (Sula9). The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

For this report, EBI utilized antenna and power data provided by Dish Wireless and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65. The assumptions used in the modeling are based upon information provided by Dish Wireless and information gathered from other sources. Elevations of walking/working surfaces were estimated based on elevations provided and available aerial imagery. Sector orientation assignments were made assuming coverage is directed to areas of site. Changes to antenna mount heights or placement will impact site compliance. The parameters used for modeling are summarized in the Site Description antenna inventory table in Section 2.0.

There are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled areas on any accessible ground-level walking/working surface related to the proposed Dish Wireless antennas that exceed the FCC's occupational or general public exposure limits at this site. At the nearest walking/working surfaces to the Dish Wireless antennas, the maximum power density generated by the Dish Wireless antennas is approximately 0.25 percent of the FCC's general public limit (0.05 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 0.25 percent of the FCC's general public limit (0.05 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna.

The Site Safety Plan also presents areas where Dish Wireless antennas contribute greater than 5% of the applicable MPE limit for a site. A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any

carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

There are no modeled areas on the ground that exceed the FCC's limits for general public or occupational exposure in front of the other carrier antennas.

The inputs used in the modeling are summarized in the Site Description antenna inventory table in Section 2.0. A graphical representation of the RoofMaster™ modeling results is presented in Appendix B. Microwave dish antennas are designed for point-to-point operations at the elevations of the installed equipment rather than ground level coverage. The maximum power density generated by all carrier antennas, including microwaves and panel antennas, is included in the modeling results presented within this report.

#### **4.0 MITIGATION/SITE CONTROL OPTIONS**

EBI's modeling indicates that there are no areas in front of the Dish Wireless antennas that exceed the FCC standards for occupational or general public exposure. All exposures above the FCC's safe limits require that individuals be elevated above the ground. In order to alert people accessing the transmission tower, a Caution sign and an NOC Information sign are recommended for installation 10 feet above ground level at the base of the transmission tower.

Barriers are recommended for installation when possible to block access to the areas in front of the antennas that exceed the FCC general public and/or occupational limits. Barriers may consist of rope, chain, or fencing. Painted stripes should only be used as a last resort. There are no barriers recommended at this site. Barriers are not recommended for installation because there are no exceedances on any walking/working surface.

These protocols and recommended control measures have been summarized and included with a graphic representation of the antennas and associated signage and control areas in a RF-EME Site Safety Plan, which is included as Appendix B. Individuals and workers accessing the transmission tower should be provided with a copy of the attached Site Safety Plan, made aware of the posted signage, and signify their understanding of the Site Safety Plan.

To reduce the risk of exposure, EBI recommends that access to areas associated with the active antenna installation be restricted and secured where possible.

Implementation of the signage recommended in the Site Safety Plan and in this report will bring this site into compliance with the FCC's rules and regulations.

#### **5.0 SUMMARY AND CONCLUSIONS**

EBI has prepared a Radiofrequency – Electromagnetic Energy (RF-EME) Compliance Report for telecommunications equipment installed by Dish Wireless Site Number SFSFO00570D located at 200 Armour Ave in S. San Francisco, California to determine worst-case predicted RF-EME exposure levels from wireless communications equipment installed at this site. This report summarizes the results of RF-EME modeling in relation to relevant Federal Communications Commission (FCC) RF-EME compliance standards for limiting human exposure to RF-EME fields.

As presented in the sections above, based on the FCC criteria, there are no modeled areas on any accessible ground-level walking/working surface related to the proposed antennas that exceed the FCC's occupational or general public exposure limits at this site.

Workers should be informed about the presence and locations of antennas and their associated fields. Recommended control measures are outlined in Section 4.0 and within the Site Safety Plan (attached);

Dish Wireless should also provide procedures to shut down and lockout/tagout this wireless equipment in accordance with their own standard operating protocol. Non-telecom workers who will be working in areas of exceedance are required to contact Dish Wireless since only Dish Wireless has the ability to lockout/tagout the facility, or to authorize others to do so.

## **6.0 LIMITATIONS**

This report was prepared for the use of Dish Wireless. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

## **Appendix A**


### **Certifications**



## Preparer Certification

I, Lindsay Clark, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified “occupational” under the FCC regulations.
- I am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.



Reviewed and Approved by:



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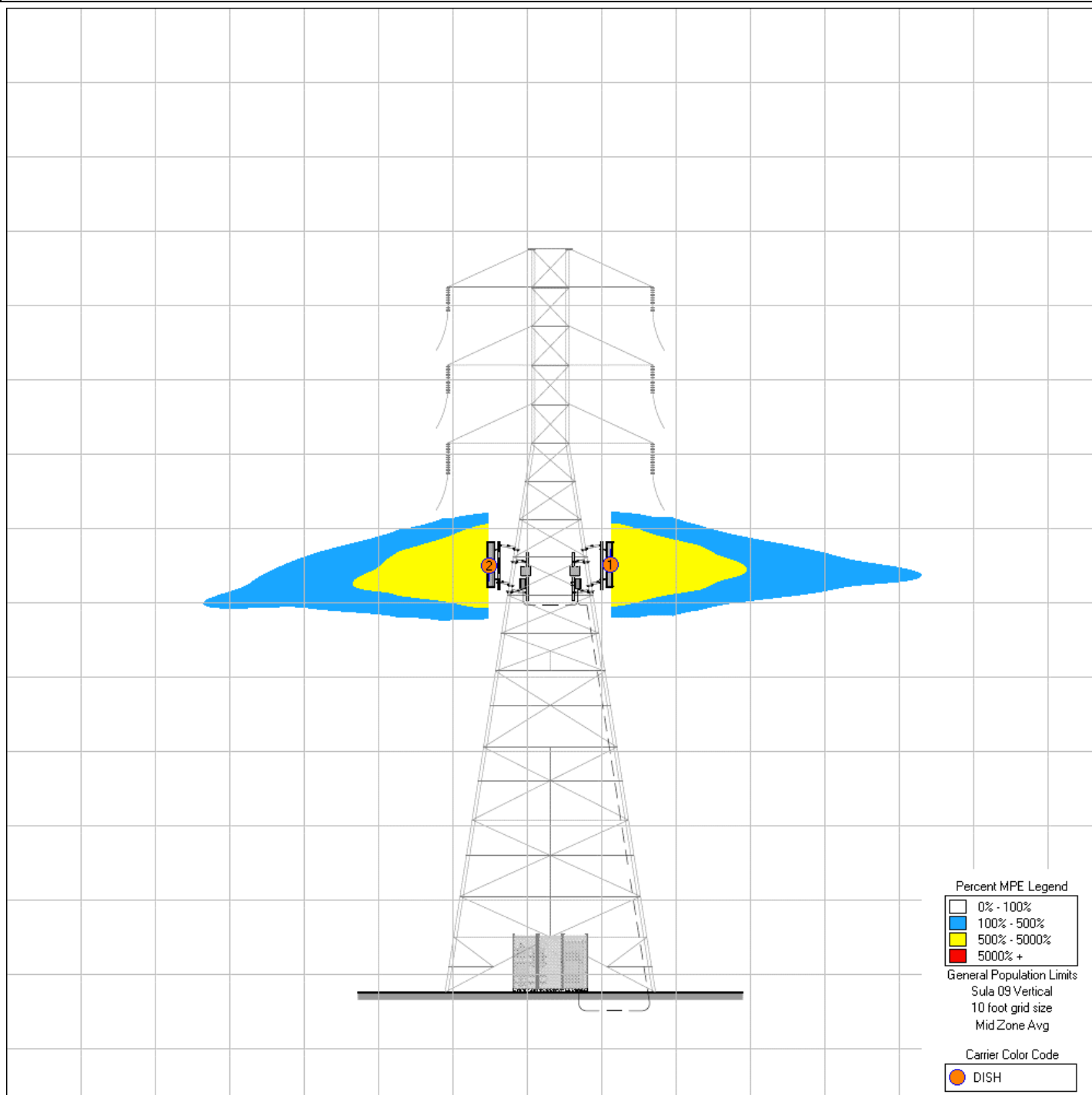
Michael McGuire  
Electrical Engineer  
[mike@h2dc.com](mailto:mike@h2dc.com)

Note that EBI's scope of work is limited to an evaluation of the Radio Frequency – Electromagnetic Energy (RF-EME) field generated by the antennas and broadcast equipment noted in this report. The engineering and design of the building and related structures, as well as the impact of the antennas and broadcast equipment on the structural integrity of the building, are specifically excluded from EBI's scope of work.

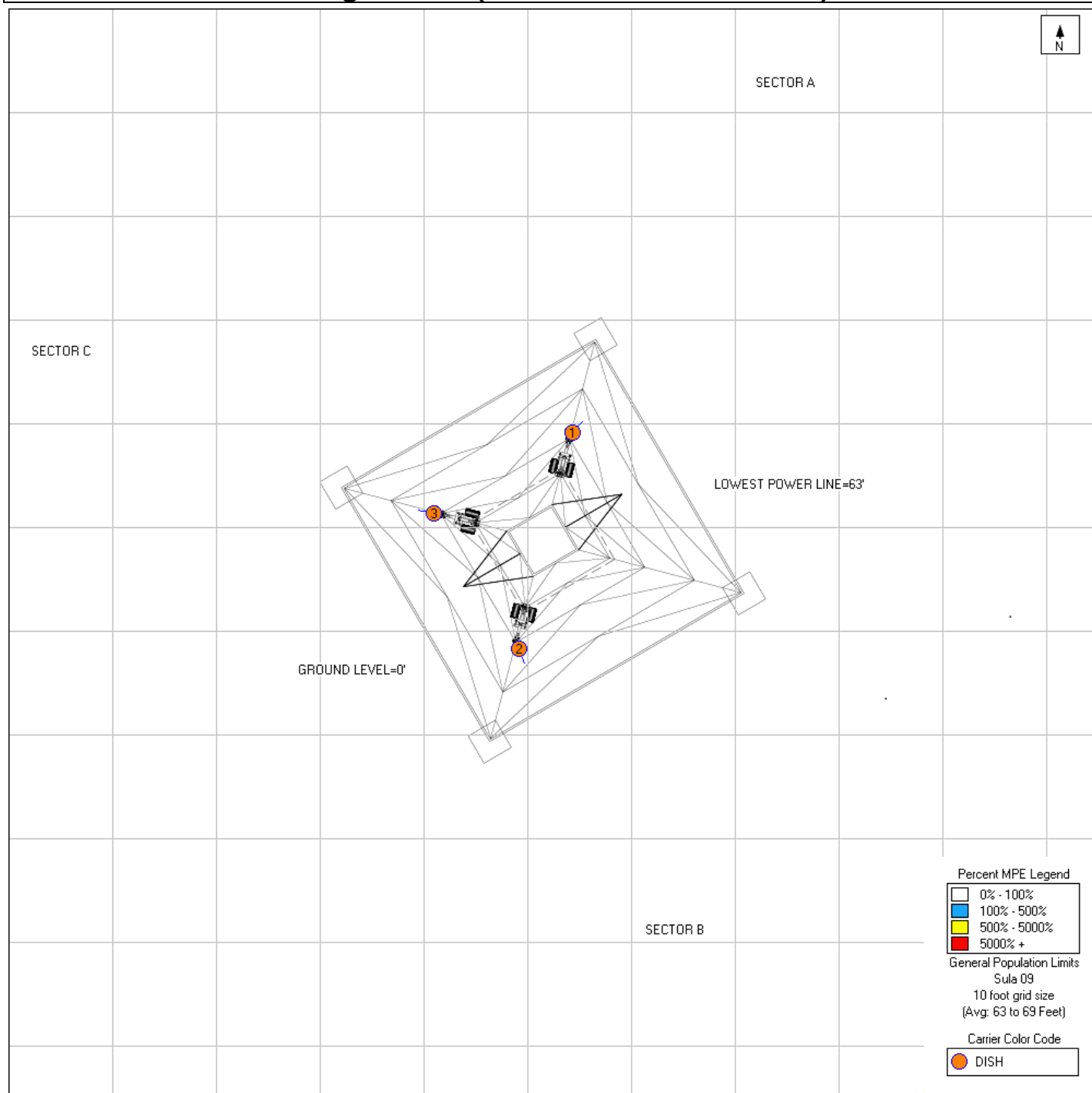
## **Appendix B**

### **Radio Frequency Electromagnetic Energy Safety Information and Signage Plans**

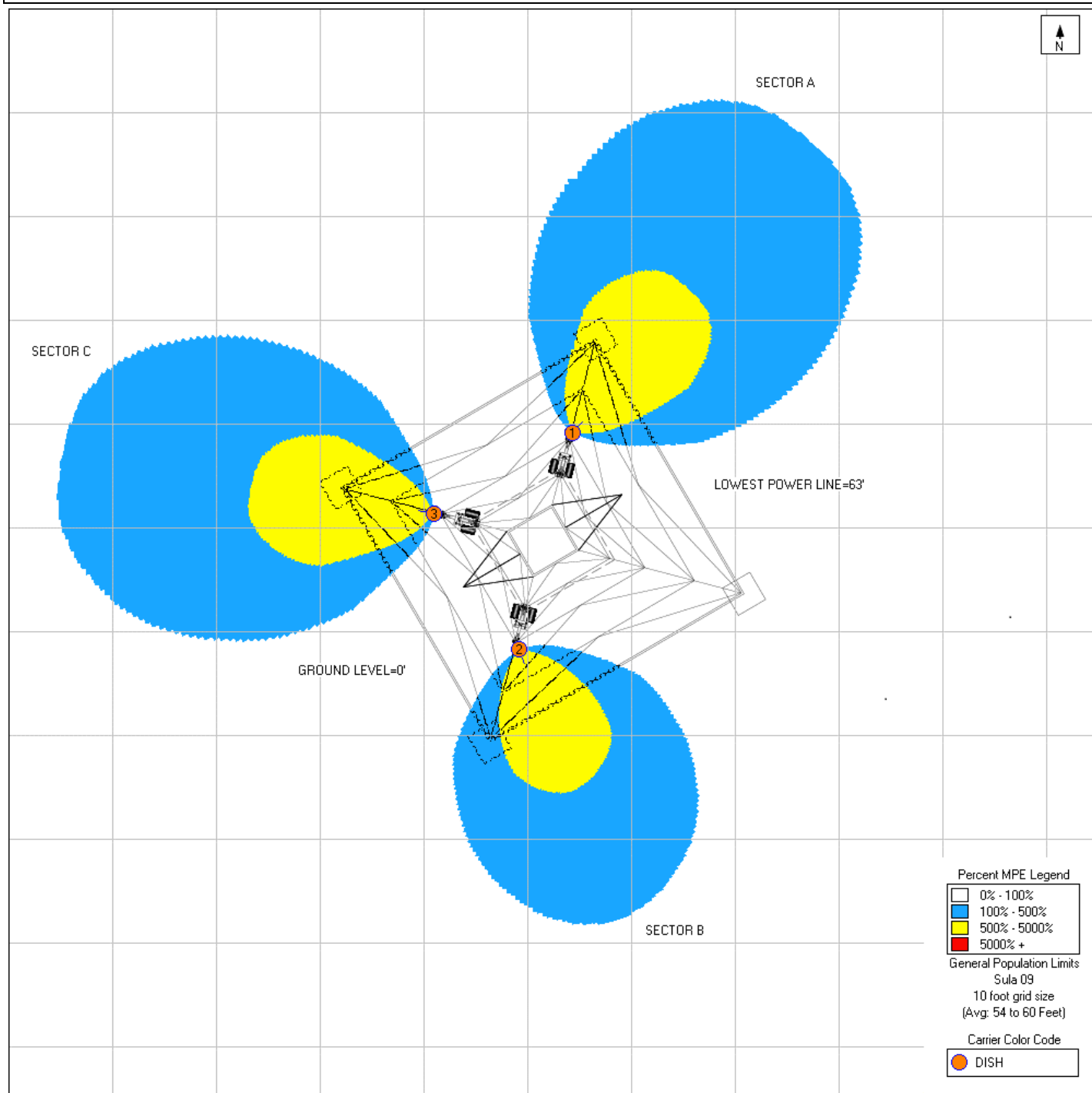
## Elevation Reference View



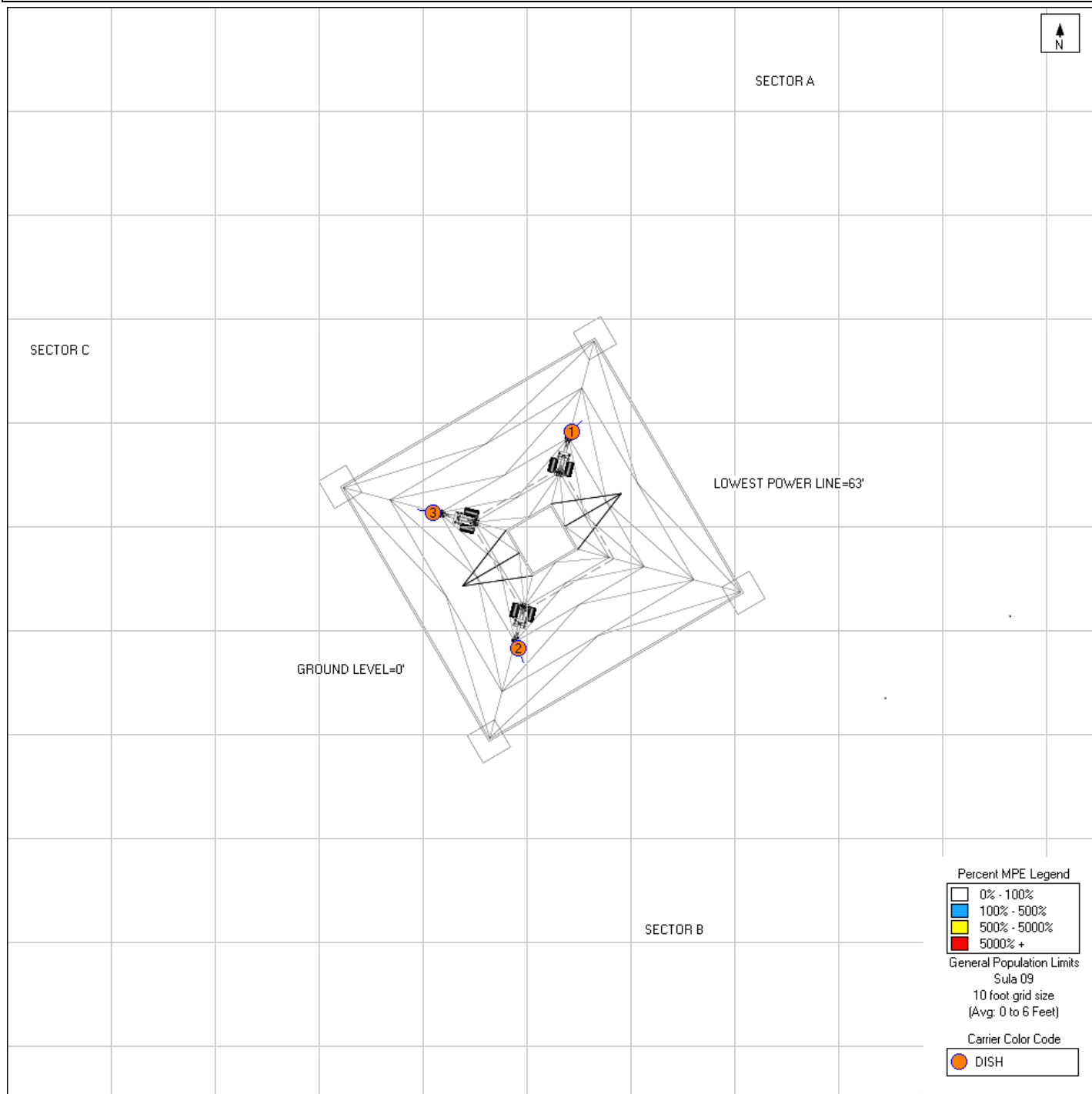
## Nearest Working Surface (Lowest Power Line Level) Simulation



## Antenna Face Level Simulation



## Ground Level Simulation



SECTOR A

SECTOR C






LOWEST POWER LINE=63'

GROUND LEVEL=0'

Post 10 feet above ground level  
at the base of the transmission  
tower.

Carrier Color Code  
DISH

10 foot grid size

Sign	Posting Instructions	Required Signage / Mitigation
	<p><b>NOC Information</b></p> <p>Information signs are used to provide contact information for any questions or concerns for personnel accessing the site.</p>	Securely post 10 feet above ground level at the base of the transmission tower in a manner conspicuous to all individuals entering thereon as indicated in the signage plan.
	<p><b>Guidelines</b></p> <p>Informational sign used to notify workers that there are active antennas installed and provide guidelines for working in RF environments.</p>	Signage not required.
	<p><b>Notice</b></p> <p>Used to notify individuals they are entering an area where the power density emitted from transmitting antennas may exceed the FCC's MPE limit for the general public or occupational exposures.</p>	Signage not required.
	<p><b>Caution</b></p> <p>Used to notify individuals that they are entering a hot spot where either the general public or occupational FCC's MPE limit is or could be exceeded.</p>	Securely post 10 feet above ground level at the base of the transmission tower in a manner conspicuous to all individuals entering thereon as indicated in the signage plan.
	<p><b>Warning</b></p> <p>Used to notify individuals that they are entering a hot zone where the occupational FCC's MPE limit has been exceeded by 10x.</p>	Signage not required.



# **Appendix C**

## **Federal Communications Commission (FCC) Requirements**

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

**Occupational/controlled exposure limits** apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

**General public/uncontrolled exposure limits** apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table I and Figure I (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm<sup>2</sup>). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm<sup>2</sup>) and an uncontrolled MPE of 1 mW/cm<sup>2</sup> for equipment operating in the 1900 MHz frequency range. For the Dish Wireless equipment operating at 600 MHz or 850 MHz, the FCC's occupational MPE is 2.83 mW/cm<sup>2</sup> and an uncontrolled MPE of 0.57 mW/cm<sup>2</sup>. For the Dish Wireless equipment operating at 1900 MHz, the FCC's occupational MPE is 5.0 mW/cm<sup>2</sup> and an uncontrolled MPE limit of 1.0 mW/cm<sup>2</sup>. These limits are considered protective of these populations.

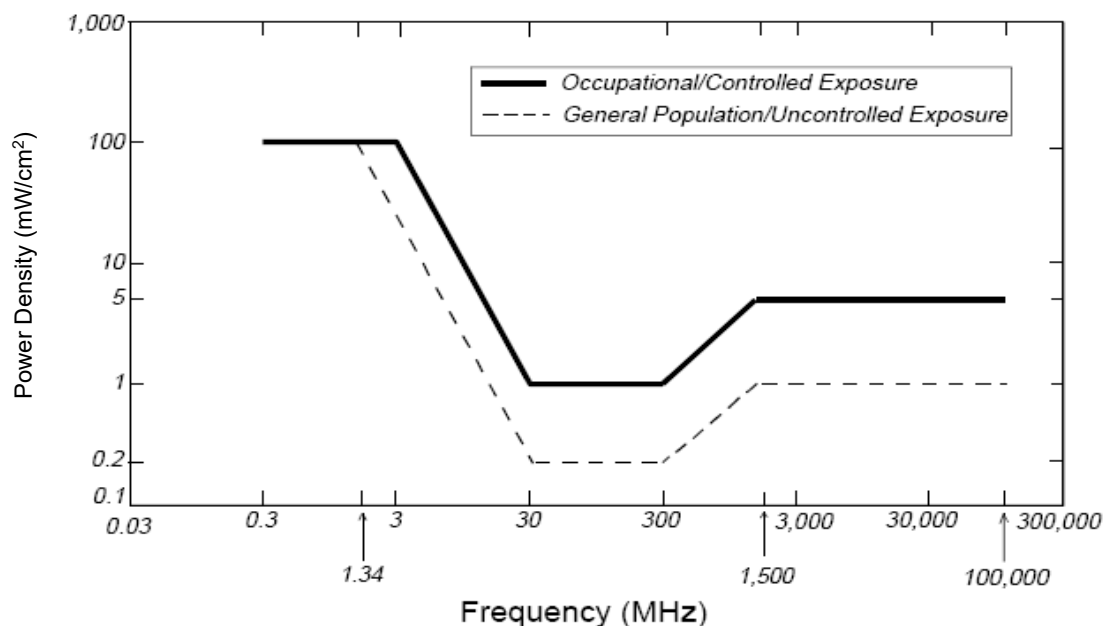
Table I: Limits for Maximum Permissible Exposure (MPE)				
(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm <sup>2</sup> )	Averaging Time [E] <sup>2</sup> , [H] <sup>2</sup> , or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f <sup>2</sup> )*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Public/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm <sup>2</sup> )	Averaging Time [E] <sup>2</sup> , [H] <sup>2</sup> , or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f <sup>2</sup> )*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)

\* Plane-wave equivalent power density

**Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)**

Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Microwave (Point-to-Point)	5,000 - 80,000 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
Broadband Radio (BRS)	2,600 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
Wireless Communication (WCS)	2,300 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
Advanced Wireless (AWS)	2,100 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
Cellular Telephone	870 MHz	2.90 mW/cm <sup>2</sup>	0.58 mW/cm <sup>2</sup>
Specialized Mobile Radio (SMR)	855 MHz	2.85 mW/cm <sup>2</sup>	0.57 mW/cm <sup>2</sup>
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm <sup>2</sup>	0.47 mW/cm <sup>2</sup>
Most Restrictive Frequency Range	30-300 MHz	1.00 mW/cm <sup>2</sup>	0.20 mW/cm <sup>2</sup>

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by Dish Wireless in this area will potentially operate within a frequency range of 600 to 2100 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

### FCC Compliance Requirement

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.