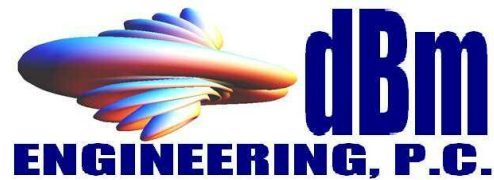


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June 14, 2019  
Matthew Grugan  
Vertical Bridge Development, LLC  
750 Park of Commerce Drive, Suite 200  
Boca Raton, Florida 33487

**Subject: Non-Ionizing Electromagnetic Radiation (NIER) Analysis**  
**“US-CO-8093 Colorado Springs”**  
**2501 AVONDALE DR**  
**COLORADO SPRINGS, CO 80917**  
**Latitude: N 38°52'13.8"**  
**Longitude: W 104°44'18.5"**

Mr. Grugan:

I have received and executed your request that I perform an independent evaluation and certification of the anticipated radio-frequency exposure levels for the proposed AT&T and existing Sprint telecommunications facility proposed at the above referenced coordinates. The intention of this study is to verify compliance with Federal Communications Commission (hereafter “FCC”) guidelines for human exposure limits to radio-frequency electromagnetic fields as per FCC Code of Federal Regulation 47 CFR 1.1307 and 1.1310. In doing so, this study will verify compliance with the American National Standards Institute (ANSI), "Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE C95.1-1992 (previously issued as IEEE C95.1-1991) as the limits to be used for evaluation are based generally on the criteria published therein. As a registered Professional Engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

### **Summary of Findings**

The maximum exposure to radio-frequency emissions from the proposed AT&T and the existing Sprint equipment will be compliant with FCC exposure limits. **Using upper limit assumptions for the AT&T and Sprint equipment configurations, the cumulative radio-frequency exposure levels would be less than 14.4% of the applicable FCC standard and the applicable safety standard prescribed by American National Standards Institute (ANSI) for non-ionizing electromagnetic radiation (NIER) at all locations of public access.** The following charts specifically illustrate the anticipated exposure levels in areas surrounding the facility. All exposure limits have been calculated using the methods prescribed in FCC Office of Engineering and Technology (OET) Bulletin 65 “Evaluating Compliance with FCC Guidelines for Human Exposure to Radio-frequency Electromagnetic Fields”. The upper-limit conditions include maximum traffic

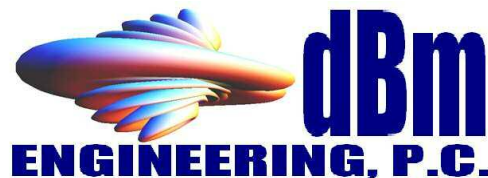
loading, significant antenna down-tilt, simultaneous maximum pattern gain for all wireless providers, and constructive interference from ground reflection. AT&T will remain within their FCC governed limits for output power but for worst-case analysis purposes, the equipment theoretical output power is considered in this analysis. Additionally, signal attenuation due to environmental clutter such as buildings, trees, and roadways has been ignored which will overestimate actual power densities. Continuous exposure at 100% of FCC limit is considered by the scientific community to be just as safe as continuous exposure at 1% of FCC limit.

### **Applicability of the National Telecommunications Act of 1996**

This Act states that “no state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio-frequency emissions to the extent that such facilities comply with the (Federal Communications) Commission’s regulations concerning such emissions”. As indicated above, this proposed facility will be in full compliance with the FCC’s emissions standards and as such is beyond regulation in that regard.

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### **Technical Parameters of Consideration**

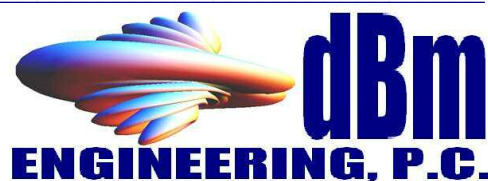
The above calculations were based on the equipment configuration information furnished by representatives of Vertical Bridge. Specifically, for this installation, AT&T plans to add up to twelve (12) panel-style antennas to the newly replace pole at an antenna centerline of 60' above grade. The antennas will be organized in three (3) arrays of up to four (4) antennas per array with sector azimuths evenly spaced in the horizontal plane with respect to true north. Transmitting through these antennas will be up to ten (10) LTE channels in the 700 MHz band (per sector) at a cumulative maximum of 400 watts, up to eight (8) LTE channels in the 1900 MHz band (per sector) at a cumulative maximum of 160 watts, up to four (4) LTE channels in the 850 MHz band (per sector) at a cumulative maximum of 160 watts, up to four (4) LTE channels in the 2100 MHz band (per sector) at a cumulative maximum of 160 watts. and up to four (4) LTE channels in the 2300 MHz band (per sector) at a cumulative maximum of 100 watts. Transmitting through the Sprint antennas attached to the newly replaced pole at an antenna centerline of 93' are a maximum of two (2) LTE channels in the 850 MHz band (per sector) at a cumulative maximum of 100 watts, up to four (4) CDMA and LTE radios in the 1900 MHz band (per sector) at a cumulative maximum of 160 watts, and a maximum of eight (8) LTE channels in the 2600 MHz band (per sector) at a cumulative maximum of 160 watts.

### **Co-location of Other Wireless Providers**

In an attempt to halt the proliferation of telecommunications structures and preserve as much of their natural landscape as possible many municipalities have adopted telecommunications ordinances that specifically require structures to accommodate additional wireless providers from a structural standpoint. **From the standpoint of radio-frequency exposure**, the AT&T equipment would in no way preclude the use of this facility by other providers.

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## **Background Information**

In 1985, the FCC first adopted guidelines to be used for evaluating human exposure to RF emissions. The FCC revised and updated these guidelines on August 1, 1996, as a result of a rule-making proceeding initiated in 1993. The new guidelines incorporate limits for Maximum Permissible Exposure (MPE) in terms of electric and magnetic field strength and power density for transmitters operating at frequencies between 300 kHz and 100 GHz.

The FCC's MPE limits are 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 were 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's limits, and the NCRP and ANSI/IEEE limits on which they are based, are derived from exposure criteria quantified in terms of specific absorption rate (SAR). The basis for these limits is a whole-body averaged SAR threshold level of 4 watts per kilogram (4 W/kg), as averaged over the entire mass of the body, above which expert organizations have determined that potentially hazardous exposures may occur. The MPE limits are derived by incorporating safety factors that lead, in some cases, to limits that are more conservative than the limits originally adopted by the FCC in 1985. Where more conservative limits exist, they do not arise from a fundamental change in the RF safety criteria for whole-body averaged SAR, but from a precautionary desire to protect subgroups of the general population who, potentially, may be more at risk.

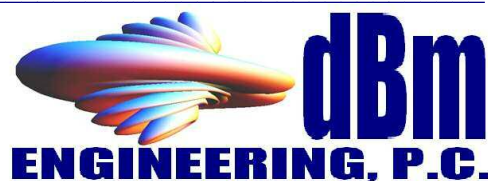
The FCC exposure limits are also based on data showing that the human body absorbs RF energy at some frequencies more efficiently than at others. The most restrictive limits occur in the frequency range of 30-300 MHz where whole-body absorption of RF energy by human beings is most efficient. At other frequencies, whole-body absorption is less efficient, and consequently, the MPE limits are less restrictive.

MPE limits are defined in terms of power density (units of milliwatts per centimeter squared:  $\text{mW}/\text{cm}^2$ ), electric field strength (units of volts per meter:  $\text{V}/\text{m}$ ) and magnetic field strength (units of amperes per meter:  $\text{A}/\text{m}$ ). The far-field of a transmitting antenna is where the electric field vector (E), the magnetic field vector (H), and the direction of propagation can be considered to be all mutually orthogonal ("plane-wave" conditions).

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

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may be above general population/uncontrolled limits, 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 population / 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. **In the case of this study, the general population exposure limits have been applied as they are the more conservative set of standards.**

#### **Additional Remarks**

The radio-frequency emission levels from AT&T and other PCS and Cellular communications base stations are similar to that of other two-way communications systems like those used by police, fire and ambulance personnel. In contrast, commercial broadcast systems like television and radio often transmit at power levels ten times greater or more than the systems discussed above.

The biological effects on humans of non-ionizing radio-frequency exposure have been studied extensively now for decades. There have been thousands of reports produced by government agencies, universities, and private research groups that support the standards adopted by the FCC. **To date, there have been no credible studies conducted whose results showed evidence of any adverse health effects at the above exposure limits.**

Sincerely,

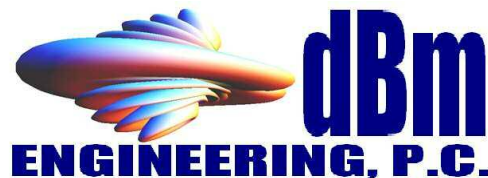


Andrew M. Petersohn, P.E.  
Registered Professional Engineer  
Pennsylvania license number 073239



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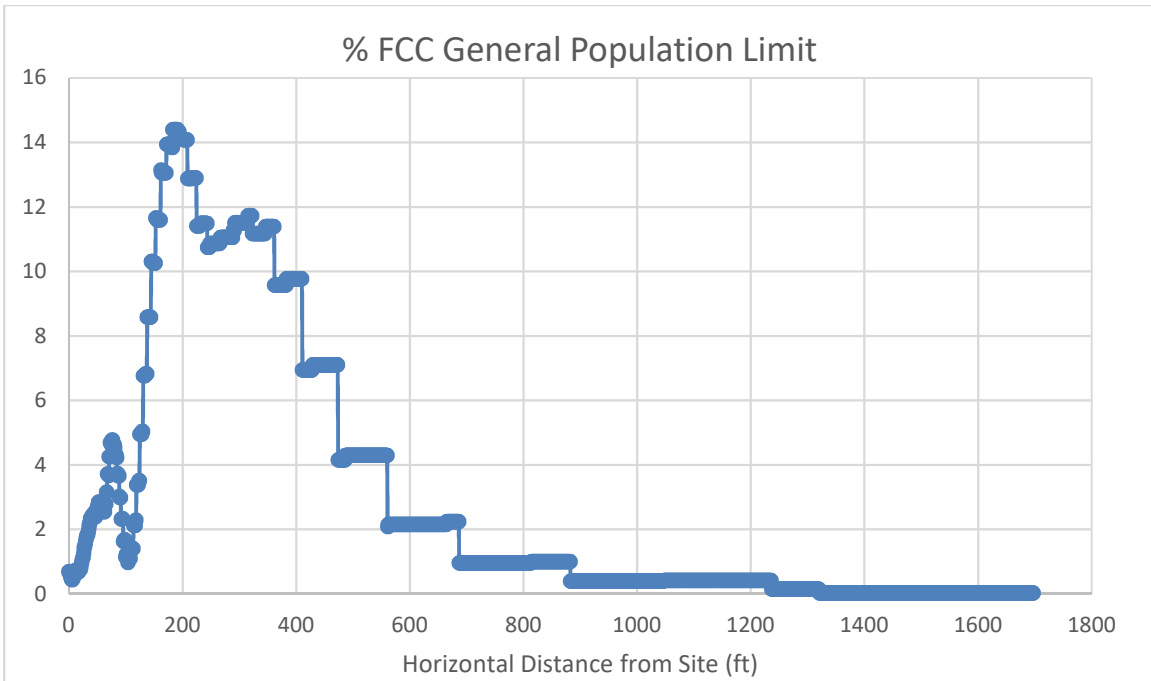


Figure-1 – calculated cumulative exposure level surrounding the proposed telecommunications facility expressed in percentage of the applicable FCC standard

Horizontal Distance from Facility (Ft.)	Height Above Ground (Ft.)	Maximum Power Density $\mu\text{W}/\text{cm}^2$ (micro-watts per square centimeter)						% of FCC Limit						Cumulative % of FCC limit across all bands
		700 MHz	850 MHz	1900 MHz	2100 MHz	2300 MHz	2600 MHz	700 MHz	850 MHz	1900 MHz	2100 MHz	2300 MHz	2600 MHz	
0	6	2.29	0.96	0.4	0.02	0.01	0.01	0.49	0.17	0.04	0.002	0.001	0.001	0.704
300	6	26.15	2.61	28.89	9.99	5.96	9.54	5.6	0.46	2.889	0.999	0.596	0.954	11.498
600	6	2.19	3.18	5.52	2.35	1.31	2.09	0.47	0.56	0.552	0.235	0.131	0.209	2.157
1320 (1/4 mi.)	6	0.05	0.68	0.05	0.01	0.02	0.04	0.01	0.12	0.005	0.001	0.002	0.004	0.142
<b>FCC Exposure Limits for General Population</b>		<b>467 <math>\mu\text{W}/\text{cm}^2</math></b>	<b>567 <math>\mu\text{W}/\text{cm}^2</math></b>	<b>1000 <math>\mu\text{W}/\text{cm}^2</math></b>	<b>1000 <math>\mu\text{W}/\text{cm}^2</math></b>	<b>1000 <math>\mu\text{W}/\text{cm}^2</math></b>	<b>1000 <math>\mu\text{W}/\text{cm}^2</math></b>							

Figure-2 – sample calculated exposure levels near the proposed telecommunications facility

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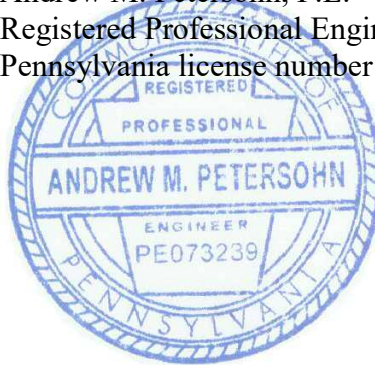
## DECLARATION OF ENGINEER

Andrew M. Petersohn, P.E., hereby states that he is a graduate telecommunications consulting engineer possessing Master and Bachelor Degrees in Electrical Engineering from Lehigh University (2005 and 1999, respectively). His corporation, dBm Engineering, P.C., has been retained by representatives of Vertical Bridge to perform an electromagnetic exposure analysis for a proposed telecommunications facility.

Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer licensed in Pennsylvania, Delaware, Maryland, Virginia, New York, Florida and New Jersey. He has over two decades of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Pennsylvania Society of Professional Engineers (PSPE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.  
Registered Professional Engineer  
Pennsylvania license number 073239



Executed this the 14<sup>th</sup> day of June, 2019.

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