

ELTA North America Request for FCC Experimental License

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Question 9: Statement of Environmental Impact

ELTA North America (N.A.) will occupy a section of the building located at 11840 West Market Place, Fulton, MD. The building is a new, single-story structure, with multiple bays, and is constructed of concrete block with a web girder and steel pan roof. The surrounding area is a mixed use development of retail, office, educational, and residential buildings. The adjacent property consists of similar single-story buildings to the north and south of the site, a public school campus to the west, and an open field to the east. Further north is a residential neighborhood and the Johns Hopkins University (JHU) Applied Physics Laboratory (APL) campus. Further east is a small urban development with multistory buildings. The antenna will be mounted on top of a four to six foot mast which will be located on the roof. The radar equipment will be remotely controlled from inside the building.

It is the policy of ELTA N.A. that company personnel, customers, or members of the public are not subjected to RF power density levels that exceed the Maximum Permissible Exposure (MPE) limits as given in Part 1.1310 of the FCC Rules. Experimental testing will only be conducted with appropriate controls in place, and no personnel will be on the roof during transmissions that will exceed the MPE levels. ELTA will have an RF Safety Plan which describes the procedures and controls necessary to comply with MPE levels during operations and maintenance. Measurements will also be used to confirm that MPE levels are not exceeded.

ELTA N.A. conducted a worst-case analysis of power density levels in the area surrounding the transmitting antenna based on the FCC's OET Bulletin Number 65¹. The applicable radar parameters and results are shown in Tables 1 and 2, respectively. With the building height of approximately 19 feet and a width of 86 feet, the line-of-sight distance from the antenna to a six-foot person standing on the ground is 184 feet. This assumes that the antenna is located in the center of the building width, and the antenna center is 4 feet above the roof. The MPE limit is exceeded for areas within 143 feet. Areas within the 143 foot radius toward the building will be blocked by the building resulting in additional attenuation of emission levels. Consequently even under worst-case conditions personnel on the ground will be either beyond the distance where the power density exceeds the MPE limit, or within the area of building blockage. Measurements will be made to confirm this conclusion.

¹ Cleveland, Robert F., et al., *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*, Edition 97-01, OET BULLETIN 65, Washington D.C.: Federal Communications Commission, Office of Engineering and Technology, August 1997.

Table 1 – Power Density Analysis

Parameter	Value
Operational frequency, MHz	1280
Transmitter output power (peak), W	400
Antenna gain (mainbeam), dBi	23
Ground reflection factor	1.6

Table 2 – Power Density Analysis Results

Parameter	Controlled	Uncontrolled
Maximum Permissible Exposure, mW/cm ²	4.27	0.85
Minimum required distance, meters	19.5	43.7
Minimum required distance, feet	64.0	143.2