

Exhibit A**Analysis of Non-Ionizing Radiation for a 7.3-Meter Earth Station System**

This report analyzes the non-ionizing radiation levels for a 7.3-meter S-band earth station system. This antenna transmits in the prime focus thru an S-band transmit transparent subreflector and receives spacecraft data in the casegrain configuration. The analysis and calculations performed in this report comply with the methods described in the FCC Office of Engineering and Technology Bulletin, No. 65 (oet65) first published in 1985 and revised in 1999 in 4th Edition. The radiation safety limits used in the analysis are in conformance with the FCC R&O 96-326. Bulletin No. 65 and the FCC R&O specifies that there are two separate tiers of exposure limits that are dependant on the situation in which the exposure takes place and/or the status of the individuals who are subject to the exposure. The Maximum Permissible Exposure (MPE) limits for persons in a General Population/Uncontrolled environment are shown in Table 1. The General Population/Uncontrolled MPE is a function of transmit frequency and is for an exposure period of thirty minutes or less. The MPE limits for persons in an Occupational/Controlled environment are shown in Table 2. The Occupational MPE is a function of transmit frequency and is for an exposure period of six minutes or less. The purpose of the analysis described in this report is to determine the power flux density levels of the earth station in the far-field, near-field, transition region, between the feed and main reflector surface, at the main reflector surface, and between the antenna edge and the ground and to compare these levels to the specified MPEs. Table 3 contains the formulas and parameters used for determining the power flux densities.

Frequency Range (MHz)	Max Power Density (mW/cm ²)
1500 – 100,000	1.0

Table 1. Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Max Power Density (mW/cm ²)
1500 – 100,000	5.0

Table 2. Limits for Occupational/Controlled Exposure (MPE)

Parameter	Symbol	Formula	Value	Units
Antenna Diameter	D	Input	7.3	meters
Antenna Surface Area	A_{surface}	$\pi D^2 / 4$	41.83	meters ²
Feed Radius	R	Input	.052	meters
Feed Aperture Area	A_{aperture}	πR^2	0.008494	meters ²
Frequency	F	Input	2085.6875	MHz
Wavelength	λ	$300 / F$	0.1438375	meters
Transmit Power	P	Input	12.0	Watts
Antenna Gain (dBi)	G_{es}	Input	41.0	dBi
Antenna Gain (scalar)	G	$10^{G_{\text{es}}/10}$	12589.2	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2 / (\pi^2 D^2)$	0.50	n/a

Table 3. Formulas and Parameters Used for Determining Power Flux Densities

Far Field Distance Calculation

At the Far Field region the angular field distribution is essentially independent of the distance from the antenna, and the field has a predominantly plane-wave character and has a uniform distribution of electric and magnetic field strength. The power flux density now decreases inversely with the square of the distance.

The distance to the beginning of the far field can be determined from the following equation:

$$\text{Distance to the Far Field Region } R_{ff} = 0.6 D^2 \div \lambda = 222.3 \text{ meters} \quad (1)$$

The maximum flux power density in the far field can be determined from the following equation:

$$\text{On-axis power flux density } S_{ff} = EIRP \div (4 \pi R_{ff}^2) \quad (2)$$

$$\text{Where } EIRP = G P = 151070.4$$

$$S_{ff} = 0.2433 \text{ W/m}^2 = 0.0243 \text{ mW/cm}^2$$

Near Field Calculation

Power flux density is considered to be worse case at a maximum value throughout the entire length of the defined Near Field region. The region is contained within a cylindrical volume having the same diameter as the antenna aperture.

The distance to the end of the Near Field can be determined from the following equation:

$$\text{Extent of the Near Field} \quad R_{nf} = D^2 \div (4\lambda) = \mathbf{92.6 \text{ meters}} \quad (3)$$

The maximum power density in the Near Field can be determined from the following equation:

$$\begin{aligned} \text{Near Field Power Flux Density} \quad S_{nf} &= 16.0 \eta P \div (\pi D^2) & (4) \\ S_{nf} &= \mathbf{0.5738 \text{ W/m}^2} = \mathbf{0.0573 \text{ mW/cm}^2} \end{aligned}$$

Transition Region Calculation

The transition region is located between the Near and Far Field regions. The power density begins to decrease linearly with increasing distance. The maximum power density in the Transition region will not exceed that calculated for the Near Field region.

The power flux density in the Transition Region at distance R_t can be determined from the following equation:

$$\text{Transition Region Power Density} \quad S_t = S_{nf} R_{nf} \div R_t \quad (5)$$

$$\text{Where the given distance} \quad R_{nf} < R_t < R_{ff}$$

$$\text{Maximum power density} \quad S_t = \mathbf{0.0573 \text{ mW/cm}^2} \quad (R_t = \mathbf{92.6 \text{ meters}})$$

Directly in Front of Feed Assembly Calculation

Transmissions from the prime focus feed assembly are directed out of the feed towards the main reflector aperture. This calculation is defined as the power density directly in front of and touching the feed assembly aperture, completely blocking and absorbing all power from the transmission out of the feed assembly to the main reflector.

The power density at the feed assembly is determined by the following equation:

$$\text{Power Density at the Feed} \quad S_{feed} = 4 P \div A_{aperture} \quad (6)$$

$$S_{feed} = \mathbf{5651.0 \text{ W/m}^2} = \mathbf{565.1 \text{ mW/cm}^2}$$

Main Reflector Region Calculation

Transmissions from the prime focus feed assembly are directed towards the main reflector aperture which in turn reflects the power towards the boresight axis of the antenna out into space.

The power density in the reflector aperture is determined by the following equation:

$$\text{Power Density at the Reflector} \quad S_{surface} = 4 P \div A_{surface} \quad (7)$$

$$S_{surface} = \mathbf{1.1475 \text{ W/m}^2} = \mathbf{0.1147 \text{ mW/cm}^2}$$

Region between the Reflector and the Ground

Assuming uniform illumination of the reflector surface, the power density between the antenna and the ground can be determined from the following equation:

$$\text{Power Flux Density to Ground } S_g = P \div A_{\text{surface}} \quad (8)$$

$$S_g = 0.2868 \text{ W/m}^2 = 0.0286 \text{ mW/cm}^2$$

Summary of Calculations

Tables 4 and 5 summarize the calculations of potential hazards.

Region	Variable	Calculated Maximum Power Flux Density (mW/cm ²)	Hazard Assessment
Far Field ($R_{ff} = 222.3$ m)	S_{ff}	0.0243	Satisfies FCC MPE
Near Field ($R_{nf} = 92.6$ m)	S_{nf}	0.0573	Satisfies FCC MPE
Transition Region ($R_{nf} < R_t < R_{ff}$)	S_t	0.0573	Satisfies FCC MPE

Table 4 Summary of Expected Radiation Levels for Uncontrolled Environment (1 mW/cm² max)

Region	Variable	Calculated Maximum Power Flux Density (mW/cm ²)	Hazard Assessment
Far Field ($R_{ff} = 222.3$ m)	S_{ff}	0.0243	Satisfies FCC MPE
Near Field ($R_{nf} = 92.6$ m)	S_{nf}	0.0573	Satisfies FCC MPE
Transition Region ($R_{nf} < R_t < R_{ff}$)	S_t	0.0573	Satisfies FCC MPE
Feed Aperture	S_{feed}	565.1	Potential Hazard
Reflector	$S_{surface}$	0.1147	Satisfies FCC MPE
Between Reflector and Ground	S_g	0.0286	Satisfies FCC MPE

Table 5 Summary of Expected Radiation Levels for Controlled Environment (5 mW/cm² max)

Conclusions

Based on the analysis, it is concluded that the FCC RF Guidelines are exceeded only upon direct contact with the feed aperture as shown in table 5. This potential hazard could only occur in the controlled environment.

Means of Compliance in Uncontrolled Areas

No hazard exists in the uncontrolled environment due to the antenna is in a locked fenced secure location. No uncontrolled person would have access to the antenna within a 15 meter distance without triggering security alarms. The only potential hazard requires a person to be directly in front of the feed horn radiating towards the reflector standing within the tripod structure that holds the feed horn in front of the reflector.

Means of Compliance in Controlled Areas

The potential hazard that exists in the controlled environment is the applicant's responsibility to insure that operational personnel are not exposed to harmful levels of radiation. Appropriate RF hazard signage will alert operational personnel at the antenna base as well as illuminated red light indicator flashing at antenna base when transmitter is active. The earth stations personnel will not have access to the area that exceeds the MPE levels while the earth station is in operation. The transmitters will be turned off during antenna maintenance.