

EXHIBIT 2

**RADIATION HAZARD STUDY
(Response to FCC Form 312, Question 28)**

Analysis of Non-Ionizing Radiation for a 9.0-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 9.0-meter earth station system. The analysis and calculations performed in this report comply with the methods described in the FCC Office of Engineering and Technology Bulletin, No. 65 first published in 1985 and revised in 1997 in Edition 97-01. 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 subreflector or 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 1. Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Power Density (mW/cm ²)
30-300	0.2
300-1500	Frequency (MHz)*(0.8/1200)
1500-100,000	1.0

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

Frequency Range (MHz)	Power Density (mW/cm ²)
30-300	1.0
300-1500	Frequency (MHz)*(4.0/1200)
1500-100,000	5.0

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

Parameter	Symbol	Formula	Value	Units
Antenna Diameter	D	Input	9.0	m
Antenna Surface Area	A _{surface}	$\pi D^2 / 4$	63.62	m ²
Subreflector Diameter	D _{sr}	Input	116.8	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2 / 4$	10714.59	cm ²
Frequency	F	Input	14197	MHz
Wavelength	λ	300 / F	0.021131	m
Transmit Power	P	Input	180.00	W
Antenna Gain (dBi)	G _{es}	Input	60.25	dBi
Antenna Gain (factor)	G	10 ^{G_{es}/10}	1059253.7	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2 / (\pi^2 D^2)$	0.59	n/a

1. Far Field Distance Calculation

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

$$\begin{aligned} \text{Distance to the Far Field Region} \quad R_{ff} &= 0.60 D^2 / \lambda \\ &= 2299.9 \text{ m} \end{aligned} \quad (1)$$

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

$$\begin{aligned} \text{On-Axis Power Density in the Far Field} \quad S_{ff} &= G P / (4 \pi R_{ff}^2) \\ &= 2.868 \text{ W/m}^2 \\ &= 0.287 \text{ mW/cm}^2 \end{aligned} \quad (2)$$

2. Near Field Calculation

Power flux density is considered to be 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. Past the boundary of the Near Field region, the power density from the antenna decreases linearly with respect to increasing distance.

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

$$\begin{aligned} \text{Extent of the Near Field} \quad R_{nf} &= D^2 / (4 \lambda) \\ &= 958.3 \text{ m} \end{aligned} \quad (3)$$

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

$$\begin{aligned} \text{Near Field Power Density} \quad S_{nf} &= 16.0 \eta P / (\pi D^2) \\ &= 6.696 \text{ W/m}^2 \\ &= 0.670 \text{ mW/cm}^2 \end{aligned} \quad (4)$$

3. 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 in the Transition region. While the power density decreases inversely with distance in the Transition region, the power density decreases inversely with the square of the distance in the Far Field region. The maximum power density in the Transition region will not exceed that calculated for the Near Field region. The power density calculated in Section 1 is the highest power density the antenna can produce in any of the regions away from the antenna. The power density at a distance R_t can be determined from the following equation:

$$\begin{aligned} \text{Transition Region Power Density} \quad S_t &= S_{nf} R_{nf} / R_t \\ &= 0.670 \text{ mW/cm}^2 \end{aligned} \quad (5)$$

4. Region between the Main Reflector and the Subreflector

Transmissions from the feed assembly are directed toward the subreflector surface, and are reflected back toward the main reflector. The most common feed assemblies are waveguide flanges, horns or subreflectors. The energy between the subreflector and the reflector surfaces can be calculated by determining the power density at the subreflector surface. This can be determined from the following equation:

$$\begin{aligned} \text{Power Density at the Subreflector} \quad S_{sr} &= 4000 P / A_{sr} & (6) \\ &= 67.198 \text{ mW/cm}^2 \end{aligned}$$

5. Main Reflector Region

The power density in the main reflector is determined in the same manner as the power density at the subreflector. The area is now the area of the main reflector aperture and can be determined from the following equation:

$$\begin{aligned} \text{Power Density at the Main Reflector Surface} \quad S_{\text{surface}} &= 4 P / A_{\text{surface}} & (7) \\ &= 11.318 \text{ W/m}^2 \\ &= 1.132 \text{ mW/cm}^2 \end{aligned}$$

6. Region between the Main 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:

$$\begin{aligned} \text{Power Density between Reflector and Ground} \quad S_g &= P / A_{\text{surface}} & (8) \\ &= 2.829 \text{ W/m}^2 \\ &= 0.283 \text{ mW/cm}^2 \end{aligned}$$

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Calculated Maximum Radiation Power Density Level (mW/cm²)		Hazard Assessment
1. Far Field ($R_{ff} = 2299.9$ m)	S_{ff}	0.287	Satisfies FCC MPE
2. Near Field ($R_{nf} = 958.3$ m)	S_{nf}	0.670	Satisfies FCC MPE
3. Transition Region ($R_{nf} < R_t < R_{ff}$)	S_t	0.670	Satisfies FCC MPE
4. Between Main Reflector and Subreflector	S_{sr}	67.198	Potential Hazard
5. Main Reflector	$S_{surface}$	1.132	Potential Hazard
6. Between Main Reflector and Ground	S_g	0.283	Satisfies FCC MPE

Table 5. Summary of Expected Radiation levels for Controlled Environment

Region	Calculated Maximum Radiation Power Density Level (mW/cm²)		Hazard Assessment
1. Far Field ($R_{ff} = 2299.9$ m)	S_{ff}	0.287	Satisfies FCC MPE
2. Near Field ($R_{nf} = 958.3$ m)	S_{nf}	0.670	Satisfies FCC MPE
3. Transition Region ($R_{nf} < R_t < R_{ff}$)	S_t	0.670	Satisfies FCC MPE
4. Between Main Reflector and Subreflector	S_{sr}	67.198	Potential Hazard
5. Main Reflector	$S_{surface}$	1.132	Satisfies FCC MPE
6. Between Main Reflector and Ground	S_g	0.283	Satisfies FCC MPE

It is the applicant's responsibility to ensure that the public and operational personnel are not exposed to harmful levels of radiation.

8. Conclusions

Based on the above analysis it is concluded that harmful levels of radiation will not exist in regions normally occupied by the public or the earth station's operating personnel. The transmitter will be turned off during antenna maintenance so that the FCC MPE of 5.0 mW/cm² will be complied with for those regions with close proximity to the reflector that exceed acceptable levels.

Access to the earth station site will be restricted and only individuals having access to the area will be aware of the Radiation Hazard from the antenna, thus creating a controlled environment.

Radiation hazard signs will be posted while this earth station is in operation.

Means of Compliance Controlled Areas

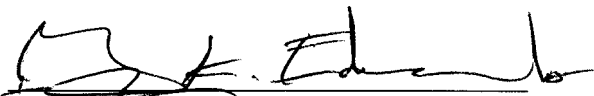
The earth station's operational staff will not have access to the areas that exceed the MPE levels while the earth station is in operation.

The transmitters will be turned off during antenna maintenance.

The applicant agrees to abide by the conditions specified in Condition 5208 provided below:

Condition 5208 - The licensee shall take all necessary measures to ensure that the antenna does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alerting signs and protective equipment for worker.

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE RADIATION HAZARD REPORT, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

BY: 

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