EXHIBIT 9

EXHIBIT FOR RADIATION HAZARD REPORTS FOR NEW ANTENNAS FOR WHICH WB36 ESV AUTHORIZATION REQUESTED

INCLUDES RADIATION HAZARD REPORTS FOR:

ORBIT 2.2 METER C-BAND ANTENNA (MODEL OCEAN TRx 7-300-C)

ORBIT 2.1 METER KU-BAND ANTENNA (MODEL OCEAN TRx 7-300-KU)

ORBIT 1.2 METER KU-BAND ANTENNA (MODEL ORSAT AL-7103 MKII-KU)

ORBIT 1.2 METER KU-BAND ANTENNA (MODEL OCEAN TRx 4-500-KU)

INTELLIAN 0.65 METER KU-BAND ANTENNA (MODEL v65/v65G)

Analysis of Non-Ionizing Radiation for a 2.2-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 2.2-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	2.2	m
Antenna Surface Area	A _{surface}	$\pi D^2/4$	3.80	m²
Subreflector Diameter	D _{sr}	Input	44.0	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2/4$	1520.53	cm ²
Frequency	F	Input	6175	MHz
Wavelength	λ	300 / F	0.048583	m
Transmit Power	Р	Input	170.20	W
Antenna Gain (dBi)	G _{es}	Input	39.2	dBi
Antenna Gain (factor)	G	10 ^{Ges/10}	8317.6	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	n	$G\lambda^2/(\pi^2D^2)$	0.41	n/a

1. Far Field Distance Calculation

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

Distance to the Far Field Region
$$R_{ff} = 0.60 D^{2} / \lambda$$

$$= 59.8 m$$
(1)

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

On-Axis Power Density in the Far Field
$$S_{ff} = G P / (4 \pi R_{ff}^{2})$$

$$= 31.530 \text{ W/m}^{2}$$

$$= 3.153 \text{ mW/cm}^{2}$$

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:

Extent of the Near Field
$$R_{nf} = D^2 / (4 \lambda)$$

$$= 24.9 \text{ m}$$
(3)

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

Near Field Power Density
$$S_{nf} = 16.0 \ \eta \ P / (\pi \ D^2)$$

$$= 73.605 \ W/m^2$$

$$= 7.361 \ mW/cm^2$$

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:

Transition Region Power Density
$$S_t = S_{nf} R_{nf} / R_t$$
 (5)
= 7.361 mW/cm²

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:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)
= 447.738 mW/cm²

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:

$$S_{\text{surface}} = 4 \text{ P / A}_{\text{surface}}$$
 (7)
= 179.095 W/m²
= 17.910 mW/cm²

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:

$$S_g = P / A_{surface}$$
 (8)
= 44.774 W/m²
= 4.477 mW/cm²

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Radiation Pow	d Maximum er Density Le //cm²)	evel Hazard Assessment
1. Far Field (R _{ff} = 59.8 m)	S _{ff}	3.153	Potential Hazard
2. Near Field (R _{nf} = 24.9 m)	S _{nf}	7.361	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	S _t	7.361	Potential Hazard
Between Main Reflector and Subreflector	S _{sr}	447.738	Potential Hazard
5. Main Reflector	S _{surface}	17.910	Potential Hazard
6. Between Main Reflector and Ground	Sg	4.477	Potential Hazard

Table 5. Summary of Expected Radiation levels for Controlled Environment

		d Maximum ower Density	
Region	Level (mW/cm²)	Hazard Assessment
1. Far Field (R _{ff} = 59.8 m)	S _{ff}	3.153	Satisfies FCC MPE
2. Near Field (R _{nf} = 24.9 m)	S _{nf}	7.361	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	St	7.361	Potential Hazard
Between Main Reflector and Subreflector	S_{sr}	447.738	Potential Hazard
5. Main Reflector	S _{surface}	17.910	Potential Hazard
6. Between Main Reflector and Ground	Sg	4.477	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 the FCC MPE guidelines have been exceeded (or met) in the regions of Table 4 and 5. The applicant proposes to comply with the MPE limits by one or more of the following methods.

The earth station will be mounted aboard a ship, and it is recommended that the lower edge of the antenna should be at least 2 meters above the deck. If this is not the case, additional procedures will be instituted to insure the safety of the Public in the vicinity of the antenna.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any buildings, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, public safety will be ensured.

The earth station will marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station, to inform those in the general population, who may be working, or otherwise present on the ship, and in or near, the main beam of the antenna.

Finally, occupational exposure will be limited, and the transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm**2 will be complied with for those regions in close proximity to the main reflector, and subreflector, which could be occupied by operating personnel.

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.

Analysis of Non-Ionizing Radiation for a 2.1-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 2.1-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	2.1	m
Antenna Surface Area	A _{surface}	$\pi D^2/4$	3.46	m²
Subreflector Diameter	D _{sr}	Input	22.0	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2/4$	380.13	cm ²
Frequency	F	Input	14250	MHz
Wavelength	λ	300 / F	0.021053	m
Transmit Power	Р	Input	77.60	W
Antenna Gain (dBi)	G _{es}	Input	46.6	dBi
Antenna Gain (factor)	G	10 ^{Ges/10}	45708.8	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2/(\pi^2D^2)$	0.47	n/a

1. Far Field Distance Calculation

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

$$R_{\rm ff} = 0.60 \, D^2 / \lambda$$
 (1)
= 125.7 m

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

$$S_{ff} = G P / (4 \pi R_{ff}^2)$$

= 17.868 W/m²
= 1.787 mW/cm²

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:

$$R_{nf} = D^2 / (4 \lambda)$$

= 52.4 m (3)

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

$$S_{nf} = 16.0 \, \eta \, P / (\pi \, D^2)$$

= 41.713 W/m²
= 4.171 mW/cm²

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:

$$S_t = S_{nf} R_{nf} / R_t$$
 (5)
= 4.171 mW/cm²

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:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)
= 816.557 mW/cm²

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:

$$S_{\text{surface}} = 4 \text{ P / A}_{\text{surface}}$$
 (7)
= 89.618 W/m²
= 8.962 mW/cm²

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:

$$S_g = P / A_{surface}$$
 (8)
= 22.404 W/m²
= 2.240 mW/cm²

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Radiation Pow	d Maximum er Density Le V/cm²)	evel Hazard Assessment
1. Far Field (R _{ff} = 125.7 m)	S _{ff}	1.787	Potential Hazard
2. Near Field (R _{nf} = 52.4 m)	S _{nf}	4.171	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	St	4.171	Potential Hazard
Between Main Reflector and Subreflector	S _{sr}	816.557	Potential Hazard
5. Main Reflector	S _{surface}	8.962	Potential Hazard
6. Between Main Reflector and Ground	Sg	2.240	Potential Hazard

Table 5. Summary of Expected Radiation levels for Controlled Environment

	Radiation P	d Maximum ower Density	
Region	Level (I	mW/cm²)	Hazard Assessment
1. Far Field (R _{ff} = 125.7 m)	S _{ff}	1.787	Satisfies FCC MPE
2. Near Field (R _{nf} = 52.4 m)	S _{nf}	4.171	Satisfies FCC MPE
3. Transition Region (R _{nf} < R _t < R _{ff})	St	4.171	Satisfies FCC MPE
Between Main Reflector and Subreflector	S _{sr}	816.557	Potential Hazard
5. Main Reflector	S _{surface}	8.962	Potential Hazard
6. Between Main Reflector and Ground	Sg	2.240	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 upon the above analysis, it is concluded that harmful levels of radiation may exist in those regions noted for the Uncontrolled (Table 4) and Controlled (Table 5) environments.

The earth station will be mounted aboard a ship, and it is recommended that the lower edge of the antenna should be at least 2 meters above the deck. If this is not the case, additional procedures will be instituted to insure the safety of the Public in the vicinity of the antenna.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any buildings, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, public safety will be ensured.

The earth station will marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station, to inform those in the general population, who may be working, or otherwise present on the ship, and in or near, the main beam of the antenna.

Finally, occupational exposure will be limited, and the transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm**2 will be complied with for those regions in close proximity to the main reflector, and subreflector, which could be occupied by operating personnel.

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.

Exhibit B Page 1 of 5

Analysis of Non-Ionizing Radiation for a 1.2-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 1.2-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	1.2	m
Antenna Surface Area	A _{surface}	$\pi D^2/4$	1.13	m²
Subreflector Diameter	D _{sr}	Input	21.0	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2/4$	346.36	cm ²
Frequency	F	Input	14250	MHz
Wavelength	λ	300 / F	0.021053	m
Transmit Power	Р	Input	83.20	W
Antenna Gain (dBi)	G _{es}	Input	42.6	dBi
Antenna Gain (factor)	G	10 ^{Ges/10}	18197.0	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2/(\pi^2D^2)$	0.57	n/a

1. Far Field Distance Calculation

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

$$R_{\rm ff} = 0.60 \, D^2 / \lambda$$
= 41.0 m (1)

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

$$S_{ff} = G P / (4 \pi R_{ff}^2)$$
 (2)
= 71.532 W/m²
= 7.153 mW/cm²

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:

$$R_{nf} = D^2 / (4 \lambda)$$

= 17.1 m (3)

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

$$S_{nf} = 16.0 \, \eta \, P / (\pi \, D^2)$$

= 166.987 W/m²
= 16.699 mW/cm²

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:

$$S_t = S_{nf} R_{nf} / R_t$$
 (5)
= 16.699 mW/cm²

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:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)
= 960.848 mW/cm²

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:

$$S_{\text{surface}} = 4 \text{ P / A}_{\text{surface}}$$
 (7)
= 294.260 W/m²
= 29.426 mW/cm²

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:

$$S_g = P / A_{surface}$$
 (8)
= 73.565 W/m²
= 7.356 mW/cm²

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

	Calculate Radiation Pow	d Maximum er Density Le	evel
Region		V/cm²)	Hazard Assessment
1. Far Field (R _{ff} = 41.0 m)	S _{ff}	7.153	Potential Hazard
2. Near Field ($R_{nf} = 17.1 \text{ m}$)	S _{nf}	16.699	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	S _t	16.699	Potential Hazard
Between Main Reflector and Subreflector	S _{sr}	960.848	Potential Hazard
5. Main Reflector	S _{surface}	29.426	Potential Hazard
6. Between Main Reflector and Ground	S _q	7.356	Potential Hazard

Table 5. Summary of Expected Radiation levels for Controlled Environment

Region	Radiation P	d Maximum ower Density mW/cm²)	Hazard Assessment
1. Far Field (R _{ff} = 41.0 m)	S _{ff}	7.153	Potential Hazard
2. Near Field (R _{nf} = 17.1 m)	S_{nf}	16.699	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	St	16.699	Potential Hazard
Between Main Reflector and Subreflector	S_{sr}	960.848	Potential Hazard
5. Main Reflector	$S_{surface}$	29.426	Potential Hazard
6. Between Main Reflector and Ground	S_{g}	7.356	Potential Hazard

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 upon the above analysis, it is concluded that harmful levels of radiation may exist in those regions noted for the Uncontrolled (Table 4) and Controlled (Table 5) environments.

The earth station will be mounted aboard a ship, and it is recommended that the lower edge of the antenna should be at least 2 meters above the deck. If this is not the case, additional procedures will be instituted to insure the safety of the Public in the vicinity of the antenna.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any buildings, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, public safety will be ensured.

The earth station will marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station, to inform those in the general population, who may be working, or otherwise present on the ship, and in or near, the main beam of the antenna.

Finally, occupational exposure will be limited, and the transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm**2 will be complied with for those regions in close proximity to the main reflector, and subreflector, which could be occupied by operating personnel.

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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	1.2	m
Antenna Surface Area	A _{surface}	$\pi D^2/4$	1.13	m²
Subreflector Diameter	D _{sr}	Input	21.0	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2/4$	346.36	cm ²
Frequency	F	Input	14250	MHz
Wavelength	λ	300 / F	0.021053	m
Transmit Power	Р	Input	83.20	W
Antenna Gain (dBi)	G _{es}	Input	42.6	dBi
Antenna Gain (factor)	G	10 ^{Ges/10}	18197.0	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2/(\pi^2D^2)$	0.57	n/a

1. Far Field Distance Calculation

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

$$R_{\rm ff} = 0.60 \, D^2 / \lambda$$
 (1)
= 41.0 m

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

$$S_{ff} = G P / (4 \pi R_{ff}^2)$$
 (2)
= 71.532 W/m²
= 7.153 mW/cm²

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:

$$R_{nf} = D^2 / (4 \lambda)$$

= 17.1 m (3)

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

$$S_{nf} = 16.0 \, \eta \, P / (\pi \, D^2)$$

= 166.987 W/m²
= 16.699 mW/cm²

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:

$$S_t = S_{nf} R_{nf} / R_t$$
 (5)
= 16.699 mW/cm²

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:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)
= 960.848 mW/cm²

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:

$$S_{\text{surface}} = 4 \text{ P / } A_{\text{surface}}$$
 (7)
= 294.260 W/m²
= 29.426 mW/cm²

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:

$$S_g = P / A_{surface}$$
 (8)
= 73.565 W/m²
= 7.356 mW/cm²

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Radiation Pow	d Maximum er Density Le V/cm²)	evel Hazard Assessment
1. Far Field (R _{ff} = 41.0 m)	S _{ff}	7.153	Potential Hazard
2. Near Field (R _{nf} = 17.1 m)	S _{nf}	16.699	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	St	16.699	Potential Hazard
Between Main Reflector and Subreflector	S _{sr}	960.848	Potential Hazard
5. Main Reflector	S _{surface}	29.426	Potential Hazard
6. Between Main Reflector and Ground	S_{g}	7.356	Potential Hazard

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} = 41.0 m)	S _{ff}	7.153	Potential Hazard
2. Near Field (R _{nf} = 17.1 m)	S _{nf}	16.699	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	St	16.699	Potential Hazard
Between Main Reflector and Subreflector	S _{sr}	960.848	Potential Hazard
5. Main Reflector	S _{surface}	29.426	Potential Hazard
6. Between Main Reflector and Ground	Sg	7.356	Potential Hazard

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 upon the above analysis, it is concluded that harmful levels of radiation may exist in those regions noted for the Uncontrolled (Table 4) and Controlled (Table 5) environments.

The earth station will be mounted aboard a ship, and it is recommended that the lower edge of the antenna should be at least 2 meters above the deck. If this is not the case, additional procedures will be instituted to insure the safety of the Public in the vicinity of the antenna.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any buildings, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, public safety will be ensured.

The earth station will marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station, to inform those in the general population, who may be working, or otherwise present on the ship, and in or near, the main beam of the antenna.

Finally, occupational exposure will be limited, and the transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm**2 will be complied with for those regions in close proximity to the main reflector, and subreflector, which could be occupied by operating personnel.

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.

Exhibit Page 1 of 5

Analysis of Non-Ionizing Radiation for a 0.65-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 0.65-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	0.65	m
Antenna Surface Area	A _{surface}	$\pi D^2/4$	0.33	m²
Subreflector Diameter	D_{sr}	Input	7.0	cm
Area of Subreflector	A _{sr}	$\pi D_{sr}^2/4$	38.48	cm ²
Frequency	F	Input	14250	MHz
Wavelength	λ	300 / F	0.021053	m
Transmit Power	Р	Input	11.60	W
Antenna Gain (dBi)	Ges	Input	38.0	dBi
Antenna Gain (factor)	G	10 ^{Ges/10}	6309.6	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2/(\pi^2D^2)$	0.67	n/a

1. Far Field Distance Calculation

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

$$R_{\rm ff} = 0.60 \, D^2 / \lambda$$
 (1)
= 12.0 m

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

$$S_{ff} = G P / (4 \pi R_{ff}^2)$$

= 40.170 W/m²
= 4.017 mW/cm²

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:

$$R_{nf} = D^2 / (4 \lambda)$$

= 5.0 m

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

$$S_{nf} = 16.0 \, \eta \, P / (\pi \, D^2)$$

= 93.775 W/m²
= 9.378 mW/cm²

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:

$$S_t = S_{nf} R_{nf} / R_t$$
 (5)
= 9.378 mW/cm²

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:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)
= 1205.680 mW/cm²

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:

$$S_{\text{surface}} = 4 \text{ P / A}_{\text{surface}}$$
 (7)
= 139.830 W/m²
= 13.983 mW/cm²

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:

$$S_g = P / A_{surface}$$
 (8)
= 34.958 W/m²
= 3.496 mW/cm²

7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Calculated Maximum Radiation Power Density Le (mW/cm²)	evel Hazard Assessment
1. Far Field (R _{ff} = 12.0 m)	S _{ff} 4.017	Potential Hazard
2. Near Field (R _{nf} = 5.0 m)	S _{nf} 9.378	Potential Hazard
3. Transition Region (R _{nf} < R _t < R _{ff})	S _t 9.378	Potential Hazard
Between Main Reflector and Subreflector	S _{sr} 1205.680	Potential Hazard
5. Main Reflector	S _{surface} 13.983	Potential Hazard
6. Between Main Reflector and Ground	S _g 3.496	Potential Hazard

Table 5. Summary of Expected Radiation levels for Controlled Environment

Region	Calculated Maximum Radiation Power Density Level (mW/cm²)		Hazard Assessment
	Sff	4.017	Satisfies FCC MPE
1. Far Field (R _{ff} = 12.0 m)			Potential Hazard
2. Near Field ($R_{nf} = 5.0 \text{ m}$)	S _{nf}	9.378	
3. Transition Region (R _{nf} < R _t < R _{ff})	St	9.378	Potential Hazard
Between Main Reflector and Subreflector	S_{sr}	1205.680	Potential Hazard
5. Main Reflector	Ssurface	13.983	Potential Hazard
6. Between Main Reflector and Ground	Sg	3.496	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 the FCC MPE guidelines have been exceeded (or met) in the regions of Table 4 and 5. The applicant proposes to comply with the MPE limits by one or more of the following methods.

The earth station will be mounted aboard a ship, and it is recommended that the lower edge of the antenna should be at least 2 meters above the deck. If this is not the case, additional procedures will be instituted to insure the safety of the Public in the vicinity of the antenna.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any buildings, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, public safety will be ensured.

The earth station will marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station, to inform those in the general population, who may be working, or otherwise present on the ship, and in or near, the main beam of the antenna.

Finally, occupational exposure will be limited, and the transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm**2 will be complied with for those regions in close proximity to the main reflector, and subreflector, which could be occupied by operating personnel.

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.