

Exhibit C

Radiation Hazard Analysis

**ANALYSIS OF NON-IONIZING RADIATION
FOR THE GCI C-BAND 3.8M EARTH STATION ANTENNA IN ST. GEORGE, ALASKA
Completed 10/8/2018**

This report analyzes the non-ionizing radiation levels for the GCI 3.8m C-band earth station antenna employed at the St. George, Alaska site. The analysis and calculations performed in this report comply with the methods described in the FCC Office of Engineering and Technology Bulletin, No. 65 entitled "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" - first published in 1985 and revised in 1997 in Edition 97-01. Bulletin No. 65 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, below. The General Population/Uncontrolled MPE is a function of the transmit frequency and is for an exposure period of thirty (30) minutes or less. The MPE limits for persons in an Occupational/Controlled environment are shown in Table 2, below. The Occupational/Controlled MPE is a function of the transmit frequency and is for an exposure period of six (6) 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 the main reflector surface, and at the main reflector surface and to compare these levels to the specified MPE limits.

The results of this analysis are summarized in Table 3 on the last page of this analysis.

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)/1500 |
| 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)/300 |
| 1500-100,000 | 5.0 |

The following parameters were used to calculate the various power flux densities for this earth station:

| | | |
|--|--------------------|---------------------|
| Location: | St. George, Alaska | |
| Latitude: | 56.600975 | °N |
| Longitude: | 169.545289 | °W |
| Operating Frequency: | 6000 | MHz |
| Wavelength (λ) | 0.04997 | meters |
| Antenna Diameter (D): | 3.80 | meters |
| Antenna Area (A): | 11.34 | meters ² |
| Transmit Antenna Gain: | 46.3 | dBi |
| Transmit Antenna Gain (G): | 42658.0 | numeric |
| Maximum 5° Off Axis Gain: | 11.5 | dBi |
| Maximum 5° Off Axis Gain (G _{5°}): | 14.2 | numeric |
| Antenna Efficiency (η): | 0.747 | numeric |
| Feed Power (P): | 400 | Watts |

1. Antenna/Main Reflector Surface Calculation

The power density in the main reflector region can be estimated by:

| | | Antenna Diameter | |
|--|----------------------|------------------|--------------------|
| | | 3.80 | meters |
| Power Density at Reflector Surface, | $S_{surface} = 4P/A$ | | |
| | $S_{surface} =$ | 141.08 | W/m ² |
| | $S_{surface} =$ | 14.11 | mW/cm ² |

$S_{surface}$ = maximum power density at antenna surface

P = power fed to the antenna

A = physical area of the antenna

2. Near Field Calculations

In the near field region, of the main beam, the power density can reach a maximum before it begins to decrease with distance.

The magnitude of the on axis (main beam) power density varies according to location in the near-field.

The distance to the end of the near field can be determined by the following equation:

| | | |
|------------------------------|---------------------------|--------|
| Extent of Near Field, | Antenna Diameter | |
| | 3.80 | meters |
| | $R_{nf} = D^2/4(\lambda)$ | |
| | $R_{nf} = 72.25$ | meters |

R_{nf} = extent of near field
 D = maximum dimension of antenna (diameter if circular)
 λ = wavelength

The maximum near-field, on-axis, power density is determined by:

| | | |
|--|-----------------------------|--------------------|
| On Axis Near Field Power Density, | Antenna Diameter | |
| | 3.80 | meters |
| | $S_{nf} = 16\eta P/\pi D^2$ | |
| | $S_{nf} = 105.42$ | W/m ² |
| | $S_{nf} = 10.54$ | mW/cm ² |

The maximum near-field, 5° off-axis, power density is determined by:

| | | |
|-------------------------------------|---|--------------------|
| Power Density at 5° Off Axis | Antenna Diameter | |
| | 3.80 | meters |
| | $S_{nf 5^\circ} = (S_{nf}/G) * G_{5^\circ}$ | |
| | $S_{nf 5^\circ} = 0.0035$ | mW/cm ² |

S_{nf} = maximum near-field power density
 $S_{nf 5^\circ}$ = maximum near-field power density (5° off axis)
 η = aperture efficiency
 P = power fed to antenna
 D = maximum dimension of antenna (diameter if circular)

3. Far Field Calculations

The power density in the far-field region decreases inversely with the square of the distance.

The distance to the beginning of the far field region can be found by the following equation:

| | | |
|--|---------------------------|--------|
| Distance to the Far Field Region, | Antenna Diameter | |
| | 3.80 | meters |
| | $R_{ff} = 0.6D^2/\lambda$ | |
| | $R_{ff} = 173.40$ | meters |

R_{ff} = distance to beginning of far field
 D = maximum dimension of antenna (diameter if circular)
 λ = wavelength

The maximum main beam power density in the far field can be calculated as follows:

| | | |
|--|----------------------------------|--------------------|
| On-Axis Power Density in the Far Field, | Antenna Diameter | |
| | 3.80 | meters |
| | $S_{ff} = (P)(G)/4\pi(R_{ff})^2$ | |
| | $S_{ff} = 45.16$ | W/m ² |
| | $S_{ff} = 4.52$ | mW/cm ² |

The maximum far-field, 5° off-axis, power density is determined by:

| | | |
|-------------------------------------|---|--------------------|
| Power Density at 5° Off Axis | Antenna Diameter | |
| | 3.80 | meters |
| | $S_{ff 5^\circ} = (S_{ff}/G) * G_{5^\circ}$ | |
| | $S_{ff 5^\circ} = 0.0015$ | mW/cm ² |

S_{ff} = power density (on axis)
 $S_{ff 5^\circ}$ = power density (5° off axis)
 P = power fed to antenna
 G = power gain of antenna in the direction of interest relative to an isotropic radiator
 R_{ff} = distance to beginning of far field

4. Transition Region Calculations

The transition region is located between the near and far field regions. The power density decreases inversely with distance in the transition region, while 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 in the near field region, as shown above will not exceed:

| | | |
|-------------------|---------------------------------|--------------------------|
| | Antenna Diameter | |
| | 3.80 | meters |
| $S_t =$ | $(S_{nf} * R_{nf}) / R$ | |
| $S_{t 5^\circ} =$ | $(S_{nf 5^\circ} * R_{nf}) / R$ | |
| $S_t =$ | 10.54 | mW/cm² |
| $S_{t 5^\circ} =$ | 0.0035 | mW/cm² |

Table 3

| Summary of Expected Radiation Levels | | | | |
|---|---|---------------------------|------------------------------------|--------------------|
| Region | Calculated Maximum radiation Level (mW/cm ²) | Distance to Region (m) | Maximum Permissible Exposure (MPE) | |
| | | | Occupational | General Population |
| 1.8m Earth Station Antenna | | | | |
| 1. Antenna Surface | $S_{surface} = 14.11$ | | Potential Hazard | Potential Hazard |
| 2. Near Field | $S_{nf} = 10.54$ | 72.2 | Potential Hazard | Potential Hazard |
| 3. Far Field | $S_{ff} = 4.52$ | 173.4 | Satisfies MPE | Potential Hazard |
| 4. Transition Region | $S_t = 10.54$ | | Potential Hazard | Potential Hazard |
| 5. Near Field 5° Off Axis | $S_{nf 5^\circ} = 0.0035$ | | Satisfies MPE | Satisfies MPE |
| 6. Far Field 5° Off Axis | $S_{ff 5^\circ} = 0.00$ | | Satisfies MPE | Satisfies MPE |
| 7. Transition Region 5° Off Axis | $S_{t 5^\circ} = 0.0035$ | | Satisfies MPE | Satisfies MPE |

7. Conclusions

Based on the above analysis, it is concluded that the OET/FCC Radiofrequency Electromagnetic Fields guidelines for Maximum Permissible Exposure (MPE) have not been exceeded in any region for this installation. Further, it should be noted that General Population/Uncontrolled MPE limit is always satisfied at angles 5° off of boresite or greater for all antenna apertures. As these earth station antennas will never be operated with elevation angles of less than the minimum specified in 47 C.F.R. Ch. 1 §25.205 (namely 5°), then the MPE associated with the General Population/Uncontrolled limits will always be satisfied even if the transmitter is upgraded at a later date to a larger size. GCI will post appropriate RF Radiation Hazard placards and other signage in the areas near these antennas and/or will restrict access to the antenna by means of fencing or other appropriate devices. Finally, the transmitter will be disabled during maintenance activities in the areas where the Occupational MPE is exceeded in order to protect personnel from exposure.



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