

## **Exhibit B**

### **Radiation Hazard Analysis**

Per the instructions in the Environmental Policy section of FCC Form 312, a Radiation Hazard Analysis performed in accordance with The Office of Engineering and Technology (OET) Bulletin No. 65 (August 1997) is attached.

**ANALYSIS OF NON-IONIZING RADIATION  
FOR VARIOUS ANTENNAS RANGING IN SIZE FROM 0.95M TO 3.80M  
Completed 05/21/2019**

This report analyzes the non-ionizing radiation levels for various Ku-band earth station antennas ranging in size from 0.95m to 3.8m. 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 <sup>2</sup> )
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 <sup>2</sup> )
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:	Various locations within Alaska, Hawaii and CONUS.									
Latitude:	Various °N									
Longitude:	Various °W									
Operating Frequency:	14250 MHz									
Wavelength (λ)	0.02104 meters									
Antenna Diameter (D):	0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
Antenna Area (A):	0.71	0.72	0.79	1.13	1.23	2.54	4.52	10.18	11.34	meters <sup>2</sup>
Transmit Antenna Gain:	41.2	41.2	42.0	43.5	43.4	46.8	49.3	52.3	53.0	dBi
Transmit Antenna Gain (G):	13182.6	13182.6	15848.9	22387.2	21877.6	47863.0	85113.8	169824.4	199526.2	numeric
Maximum 5° Off Axis Gain:	11.5	11.5	11.5	11.5	11.5	11.5	11.5	11.5	11.5	dBi
Maximum 5° Off Axis Gain (G <sub>5°</sub> ):	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	14.2	numeric
Antenna Efficiency (η):	0.655	0.641	0.711	0.697	0.628	0.662	0.663	0.588	0.620	numeric
Feed Power (P):	10	10	40	40	40	40	150	150	150	Watts

**1. Antenna/Main Reflector Surface Calculation**

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

Power Density at Reflector Surface, S <sub>surface</sub>	Antenna Diameter									
	0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
S <sub>surface</sub> = 4P/A										
S <sub>surface</sub> =	56.43	55.26	203.72	141.47	130.38	62.88	132.63	58.95	52.90	W/m <sup>2</sup>
S <sub>surface</sub> =	5.64	5.53	20.37	14.15	13.04	6.29	13.26	5.89	5.29	mW/cm <sup>2</sup>

S<sub>surface</sub> = 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, R <sub>nf</sub>	Antenna Diameter									
	0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
R <sub>nf</sub> = D <sup>2</sup> /4(λ)										
R <sub>nf</sub> =	10.72	10.95	11.88	17.11	18.57	38.50	68.45	154.01	171.59	meters

R<sub>nf</sub> = 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, S <sub>nf</sub>	Antenna Diameter									
	0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
S <sub>nf</sub> = 16ηP/πD <sup>2</sup>										
S <sub>nf</sub> =	36.96	35.45	144.79	98.63	81.87	41.65	87.89	34.64	32.78	W/m <sup>2</sup>
S <sub>nf</sub> =	3.70	3.54	14.48	9.86	8.19	4.17	8.79	3.46	3.28	mW/cm <sup>2</sup>

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

Power Density at 5° Off Axis, S <sub>nf 5°</sub>	Antenna Diameter									
	0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
S <sub>nf 5°</sub> = (S <sub>nf</sub> /G)*G <sub>5°</sub>										
S <sub>nf 5°</sub> =	0.0040	0.0038	0.0130	0.0063	0.0053	0.0012	0.0015	0.0003	0.0002	mW/cm <sup>2</sup>

S<sub>nf</sub> = maximum near-field power density

$S_{nf\ 5^\circ}$  = maximum near-field power density (5° off axis)  
 $\eta$  = 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:

		Antenna Diameter								
		0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80
Distance to the Far Field Region,	$R_{ff} = 0.6D^2/\lambda$									
	$R_{ff}$	25.74	26.28	28.52	41.07	44.56	92.40	164.27	369.62	411.82

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

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

		Antenna Diameter									
		0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
On-Axis Power Density in the Far Field,	$S_{ff} = (P)(G)/4\pi(R_{ff})^2$										
	$S_{ff}$	15.83	15.18	62.02	42.25	35.07	17.84	37.65	14.84	14.04	W/m <sup>2</sup>
	$S_{ff}$	1.58	1.52	6.20	4.23	3.51	1.78	3.76	1.48	1.40	mW/cm <sup>2</sup>

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

		Antenna Diameter								
		0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80
Power Density at 5° Off Axis	$S_{ff\ 5^\circ} = (S_{ff}/G) * G_{5^\circ}$									
	$S_{ff\ 5^\circ}$	0.0017	0.0016	0.0056	0.0027	0.0023	0.0005	0.0006	0.0001	0.0001

$S_{ff}$  = 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									
		0.95	0.96	1.00	1.20	1.25	1.80	2.40	3.60	3.80	meters
	$S_t = (S_{nf} * R_{nf})/R$										
	$S_{t\ 5^\circ} = (S_{nf\ 5^\circ} * R_{nf})/R$										
	$S_t$	3.70	3.54	14.48	9.86	8.19	4.17	8.79	3.46	3.28	mW/cm <sup>2</sup>
	$S_{t\ 5^\circ}$	0.0040	0.0038	0.0130	0.0063	0.0053	0.0012	0.0015	0.0003	0.0002	mW/cm <sup>2</sup>

Table 3

Summary of Expected Radiation Levels				
Region	Calculated Maximum Radiation Level (mW/cm <sup>2</sup> )	Distance to Region (m)	Maximum Permissible Exposure (MPE)	
			Occupational	General Population
<b>0.95m Earth Station Antenna</b>				
1. Antenna Surface	$S_{surface} = 5.64$		Potential Hazard	Potential Hazard
2. Near Field	$S_{nf} = 3.70$	10.7	Satisfies MPE	Potential Hazard
3. Far Field	$S_{ff} = 1.58$	25.7	Satisfies MPE	Potential Hazard
4. Transition Region	$S_t = 3.70$		Satisfies MPE	Potential Hazard
5. Near Field 5° Off Axis	$S_{nf\ 5^\circ} = 0.0040$		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	$S_{t\ 5^\circ} = 0.0040$		Satisfies MPE	Satisfies MPE
<b>0.96m Earth Station Antenna</b>				
1. Antenna Surface	$S_{surface} = 5.53$		Potential Hazard	Potential Hazard
2. Near Field	$S_{nf} = 3.54$	11.0	Satisfies MPE	Potential Hazard
3. Far Field	$S_{ff} = 1.58$	26.3	Satisfies MPE	Potential Hazard
4. Transition Region	$S_t = 3.54$		Satisfies MPE	Potential Hazard
5. Near Field 5° Off Axis	$S_{nf\ 5^\circ} = 0.0038$		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	$S_{t\ 5^\circ} = 0.0038$		Satisfies MPE	Satisfies MPE
<b>1.0m Earth Station Antenna</b>				
1. Antenna Surface	$S_{surface} = 20.37$		Potential Hazard	Potential Hazard
2. Near Field	$S_{nf} = 14.48$	11.9	Potential Hazard	Potential Hazard
3. Far Field	$S_{ff} = 6.20$	28.5	Potential Hazard	Potential Hazard
4. Transition Region	$S_t = 14.48$		Potential Hazard	Potential Hazard
5. Near Field 5° Off Axis	$S_{nf\ 5^\circ} = 0.0130$		Satisfies MPE	Satisfies MPE
6. Far Field 5° Off Axis	$S_{ff\ 5^\circ} = 0.01$		Satisfies MPE	Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t\ 5^\circ} = 0.0130$		Satisfies MPE	Satisfies MPE

<b>1.2m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 14.15$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 9.86$	17.1		Potential Hazard		Potential Hazard
3. Far Field	$S_{\text{ff}} = 4.23$	41.1		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 9.86$			Potential Hazard		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0063$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0063$			Satisfies MPE		Satisfies MPE
<b>1.25m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 13.04$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 8.19$	18.6		Potential Hazard		Potential Hazard
3. Far Field	$S_{\text{ff}} = 3.51$	44.6		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 8.19$			Potential Hazard		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0053$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0053$			Satisfies MPE		Satisfies MPE
<b>1.80m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 6.29$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 4.17$	38.5		Satisfies MPE		Potential Hazard
3. Far Field	$S_{\text{ff}} = 1.78$	92.4		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 4.17$			Satisfies MPE		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0012$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0012$			Satisfies MPE		Satisfies MPE
<b>2.40m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 13.26$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 8.79$	68.4		Potential Hazard		Potential Hazard
3. Far Field	$S_{\text{ff}} = 3.76$	164.3		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 8.79$			Potential Hazard		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0015$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0015$			Satisfies MPE		Satisfies MPE
<b>3.60m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 5.89$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 3.46$	154.0		Satisfies MPE		Potential Hazard
3. Far Field	$S_{\text{ff}} = 1.48$	369.6		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 3.46$			Satisfies MPE		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0003$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0003$			Satisfies MPE		Satisfies MPE
<b>3.80m Earth Station Antenna</b>						
1. Antenna Surface	$S_{\text{surface}} = 5.29$			Potential Hazard		Potential Hazard
2. Near Field	$S_{\text{nf}} = 3.28$	171.6		Satisfies MPE		Potential Hazard
3. Far Field	$S_{\text{ff}} = 1.40$	411.8		Satisfies MPE		Potential Hazard
4. Transition Region	$S_t = 3.28$			Satisfies MPE		Potential Hazard
5. Near Field 5° Off Axis	$S_{\text{nf } 5^\circ} = 0.0002$			Satisfies MPE		Satisfies MPE
6. Far Field 5° Off Axis	$S_{\text{ff } 5^\circ} = 0.00$			Satisfies MPE		Satisfies MPE
7. Transition Region 5° Off Axis	$S_{t 5^\circ} = 0.0002$			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 been exceeded in the region(s) specified in Table 3. However, it should be noted that General Population/Uncontrolled MPE limit is always satisfied at angles 5° off of boresite or greater for all antenna sizes. 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 as long as people are not permitted near the main beam of the antenna. GCI will post appropriate RF Radiation Hazard placards and other signage in the areas near these antennas and will restrict access to the antenna by means of fencing or other appropriate devices. Finally, access to the antenna surface, as well as the region between the feedhorn and the antenna surface will be restricted to qualified personnel and the transmitter will be disabled during maintenance activities in these areas to protect personnel from exposure.



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