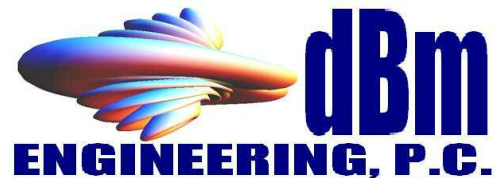


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February 21, 2024  
Matt Penning  
Milestone Towers  
12110 Sunset Hills Rd, #600  
Reston, VA 20190

**Subject: Electromagnetic Exposure Analysis  
"Clarks Gap"  
ROUTE 9 AND ROUTE 7 INTERCHANGE  
PAEONIAN SPRINGS, VA 20129**

Mr. Penning:

I have received and executed your request that I perform an independent evaluation and certification of the cumulative anticipated radio-frequency exposure levels for the AT&T telecommunications facility proposed at the above referenced address. The intention of this study is to verify compliance with Federal Communications Commission (hereafter "FCC") guidelines for human exposure limits to radio-frequency electromagnetic fields as per FCC Code of Federal Regulation 47 CFR 1.1307 and 1.1310. As a registered Professional Engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

### **Summary of Findings**

The maximum exposure to radio-frequency emissions from the proposed AT&T equipment will be far below FCC exposure limits. **Using upper limit assumptions for the AT&T equipment configuration, the cumulative radio-frequency exposure levels would be less than 4.2% of the applicable FCC standard at all ground level locations of public access.** The following charts specifically illustrate the anticipated exposure levels in areas surrounding the facility. All exposure levels have been calculated using the methods prescribed in FCC Office of Engineering and Technology (OET) Bulletin 65 "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio-frequency Electromagnetic Fields". These upper-limit conditions include maximum traffic loading, significant antenna down-tilt, maximum pattern gain, and constructive interference from ground reflection. Additionally, signal attenuation due to environmental clutter such as buildings, trees, and roadways has been ignored which will overestimate actual power densities.

### **Applicability of the National Telecommunications Act of 1996**

This Act states that “no state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio-frequency emissions to the extent that such facilities comply with the (Federal Communications) Commission’s regulations concerning such emissions”. As indicated above, this proposed facility will be in full compliance with the FCC’s emissions standards and as such is beyond regulation in that regard.

### **Technical Parameters of Consideration**

The above calculations were based on the equipment configuration information furnished by representatives of AT&T. Specifically, for this installation, the current AT&T design includes the installation of twelve (12) new panel-style antennas at an average antenna centerline height of 145’ above grade. The antennas will be organized in three (3) arrays of four (4) antenna positions per array with sector azimuths evenly spaced in the horizontal plane with respect to true north. Transmitting through these antennas will be up to twelve (12) LTE transmit paths in the 700 MHz band (per sector) at a cumulative maximum of 370 watts, up to four (4) LTE and / or four (4) 5G NR transmit paths in the 1900 MHz band (per sector) at a cumulative maximum of 160 watts, up to four (4) LTE and / or four (4) 5G NR transmit paths in the 850 MHz band (per sector) at a cumulative maximum of 160 watts, up to eight (8) LTE and / or four (4) 5G NR transmit paths in the 2100 MHz band (per sector) at a cumulative maximum of 320 watts, up to four (4) LTE transmit paths in the 2300 MHz band (per sector) at a cumulative maximum of 100 watts, up to sixty-four (64) 5G NR transmit paths in the C-Band band (per sector) at a cumulative maximum of 200 watts, and up to sixty-four (64) 5G NR transmit paths in the DoD band (per sector) at a cumulative maximum of 200 watts.

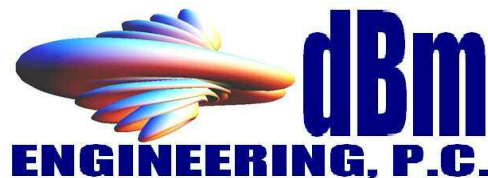
### **Co-location of Other Wireless Providers and Anticipated Exposure Levels**

In an attempt to halt the proliferation of telecommunications structures and preserve as much of their natural landscape as possible many municipalities have adopted telecommunications ordinances that specifically require new structures to accommodate additional wireless providers from a structural standpoint. **From the standpoint of radio-frequency exposure**, the installation of the proposed AT&T equipment would in no way preclude the use of this facility by other providers.

For purposes of a worse-case scenario examination, this analysis contemplates three (3) co-locaters on the monopole with antenna centerlines of 135’, 125’ and 115’. These hypothetical providers are assumed to have antenna and radio configurations identical to those proposed by AT&T (one of the more heavily channelized providers) except for their incrementally lower heights. Because it is impossible to know which (if any) co-locaters with eventually utilize this structure and what their radio frequency configuration could be,

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this analysis is only meant to provide a rough estimate as to what expected exposure levels could be if the structure were utilized to its full potential.

Using upper limit assumptions for the AT&T equipment configuration, and three more identically channelized wireless service providers with antenna centerlines at ten (10) foot increments below the AT&T array, the cumulative radio-frequency exposure levels would be less than 16.7% of the applicable FCC standard at all ground level locations of public access. Measured exposure readings are always significantly lower than the worse-case exposure calculations. According to page 14 of the FCC Office of Engineering and Technology (OET) Bulletin 65 “Evaluating Compliance with FCC Guidelines for Human Exposure to Radio-frequency Electromagnetic Fields”<sup>1</sup>:

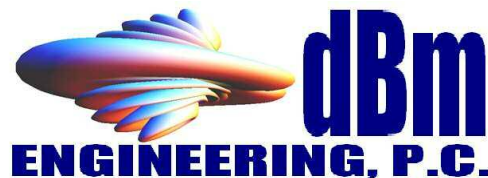
*For antennas mounted higher than 10 meters, measurement data for cellular facilities have indicated that ground-level power densities are typically hundreds to thousands of times below the new MPE limits.*

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<sup>1</sup> [https://transition.fcc.gov/Bureaus/Engineering\\_Technology/Documents/bulletins/oet65/oet65.pdf](https://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet65/oet65.pdf)

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## **Background Information**

In 1985, the FCC first adopted guidelines to be used for evaluating human exposure to RF emissions. The FCC revised and updated these guidelines on August 1, 1996, as a result of a rule-making proceeding initiated in 1993. The new guidelines incorporate limits for Maximum Permissible Exposure (MPE) in terms of electric and magnetic field strength and power density for transmitters operating at frequencies between 300 kHz and 100 GHz. The FCC's MPE limits are based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits were developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC's limits, and the NCRP and ANSI/IEEE limits on which they are based, are derived from exposure criteria quantified in terms of specific absorption rate (SAR). The basis for these limits is a whole-body averaged SAR threshold level of 4 watts per kilogram (4 W/kg), as averaged over the entire mass of the body, above which expert organizations have determined that potentially hazardous exposures may occur. The MPE limits are derived by incorporating safety factors that lead, in some cases, to limits that are more conservative than the limits originally adopted by the FCC in 1985. Where more conservative limits exist, they do not arise from a fundamental change in the RF safety criteria for whole-body averaged SAR, but from a precautionary desire to protect subgroups of the general population who, potentially, may be more at risk.

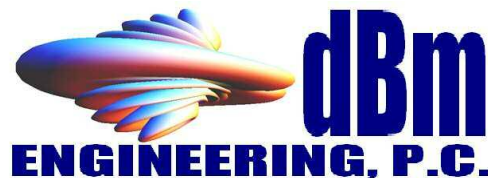
The FCC exposure limits are also based on data showing that the human body absorbs RF energy at some frequencies more efficiently than at others. The most restrictive limits occur in the frequency range of 30-300 MHz where whole-body absorption of RF energy by human beings is most efficient. At other frequencies, whole-body absorption is less efficient, and consequently, the MPE limits are less restrictive.

MPE limits are defined in terms of power density (units of milliwatts per centimeter squared:  $\text{mW}/\text{cm}^2$ ), electric field strength (units of volts per meter:  $\text{V}/\text{m}$ ) and magnetic field strength (units of amperes per meter:  $\text{A}/\text{m}$ ). The far-field of a transmitting antenna is where the electric field vector (E), the magnetic field vector (H), and the direction of propagation can be considered to be all mutually orthogonal ("plane-wave" conditions).

Occupational / controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits, as long as the exposed person has

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been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General population / uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area. **In the case of this study, the general population exposure limits have been applied as they are the more conservative set of standards.**

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**Additional Remarks**

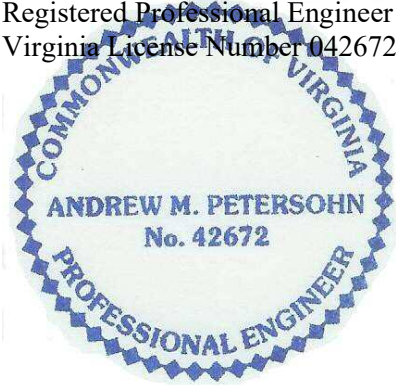
The radio-frequency emission levels from AT&T and other communications base stations are similar to that of other two-way communications systems like those used by police, fire and ambulance personnel. In contrast, commercial broadcast systems like television and radio often transmit at power levels ten times greater or more than the systems discussed above. The FCC exposure limits already include a significant margin of safety. Continuous exposure below 100% of FCC limit is considered by the scientific community to be just as safe as continuous exposure at 1% of FCC limit.

The biological effects on humans of non-ionizing radio-frequency exposure have been studied extensively now for decades. There have been thousands of reports produced by government agencies, universities, and private research groups that support the standards adopted by the FCC. **To date, there have been no credible studies conducted whose results showed evidence of any adverse health effects at the applicable FCC exposure limits.**

Sincerely,



Andrew M. Petersohn, P.E.  
Registered Professional Engineer  
Virginia License Number 042672



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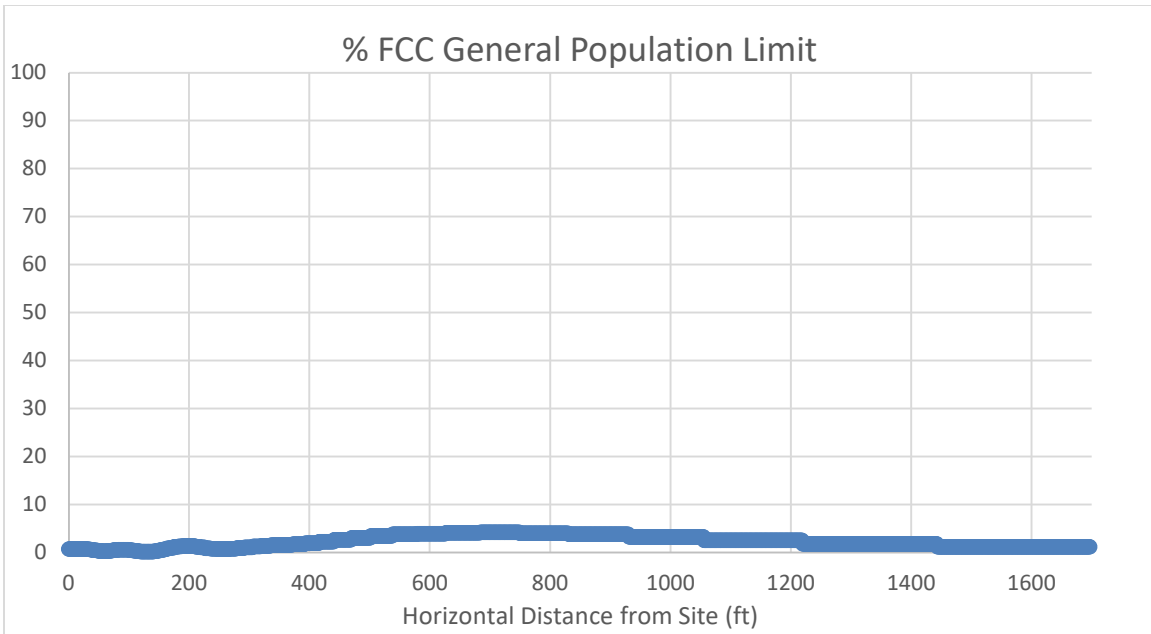


Figure-1 – calculated ground level cumulative exposure level surrounding the proposed telecommunications facility expressed in percentage of the applicable FCC standard

Horizontal Distance from Facility (Ft.)	Relative Height Above Ground (Ft.)	Maximum Power Density $\mu\text{W}/\text{cm}^2$ (micro-watts per square centimeter)							% of FCC Limit							Cumulative % of FCC limit across all bands
		700 MHz	850 MHz	1900 MHz	2100 MHz	2300 MHz	3500 MHz	3700 MHz	700 MHz	850 MHz	1900 MHz	2100 MHz	2300 MHz	3500 MHz	3700 MHz	
0	6	0.33	0	0.02	0	0	3.15	3.15	0.07	0	0.002	0	0	0.315	0.315	0.702
300	6	1.03	0.57	0.01	0.05	0.03	3.46	3.46	0.22	0.1	0.001	0.005	0.003	0.346	0.346	1.021
600	6	7.43	2.89	0.21	0.07	0.05	8.94	8.94	1.59	0.51	0.021	0.007	0.005	0.894	0.894	3.921
1320 (1/4 mi.)	6	0.65	0.28	0.75	0.81	0.51	6.97	6.97	0.14	0.05	0.075	0.081	0.051	0.697	0.697	1.791
<b>FCC Exposure Limits for General Population (<math>\mu\text{W}/\text{cm}^2</math>)</b>		<b>467</b>	<b>567</b>	<b>1000</b>	<b>1000</b>	<b>1000</b>	<b>1000</b>	<b>1000</b>								

Figure-2 – sample calculated exposure levels near the proposed telecommunications facility



## DECLARATION OF ENGINEER

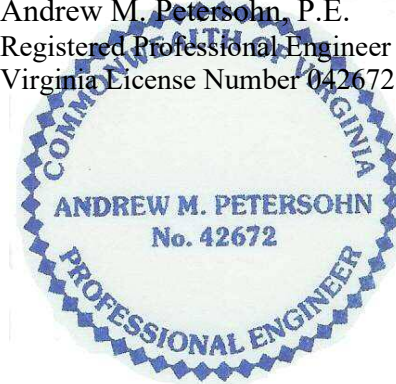
Andrew M. Petersohn, P.E., hereby states that he is a graduate telecommunications consulting engineer possessing Master and Bachelor Degrees in Electrical Engineering from Lehigh University (2005 and 1999, respectively). His corporation, dBm Engineering, P.C., has been retained by representatives of Milestone Towers to perform an electromagnetic emissions analysis for a proposed telecommunications facility.

Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer licensed in Pennsylvania, Delaware, Maryland, Virginia, New York, Florida and New Jersey. He has over two decades of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Pennsylvania Society of Professional Engineers (PSPE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.  
Registered Professional Engineer  
Virginia License Number 042672

Executed this the 21<sup>st</sup> day of February, 2024.



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