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RF COMPLIANCE EXPERTS
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SmartLink, LLC on behalf of AT&T Mobility, LLC
Site FA – 10141394
Site ID – CTL01330 (3C)
USID – 139386
Site Name – Avon-Montevideo Road
Site Compliance Report

324 Montevideo Road
Avon, CT 06001

Latitude: N41-48-42.47
Longitude: W72-47-55.56
Structure Type: Tower

Report generated date: January 11, 2016
Report by: Sam Cosgrove
Customer Contact: Kristen Smith

AT&T Mobility, LLC will be compliant when the remediation recommended in section 5.2 or other appropriate remediation is implemented.

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STATE OF CONNECTICUT
DAVID C. COTTON, JR.
NO. 27481
LICENSED
PROFESSIONAL ENGINEER

David C. Cotton, Jr.
Licensed Professional Engineer (Electrical)
State of Connecticut, PEN.0027481
Date: 2016-January-12

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1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Access to Antennas Locked?	Yes
RF Sign(s) @ access point(s)	None
RF Sign(s) @ antennas	None
Barrier(s) @ sectors	None
Max cumulative simulated Radio Frequency Exposure (RFE) level on the Doppler Radar Dome	36.0% of General Public limit
FCC & AT&T Compliant?	Will Be Compliant

The following documents were provided by the client and were utilized to create this report:

CD's: 10141394_AE201_121515_CTL01330.Rev1.CD.s&s

RF Configuration Datasheet: CT_33 sites with power density form

2 Map of Site

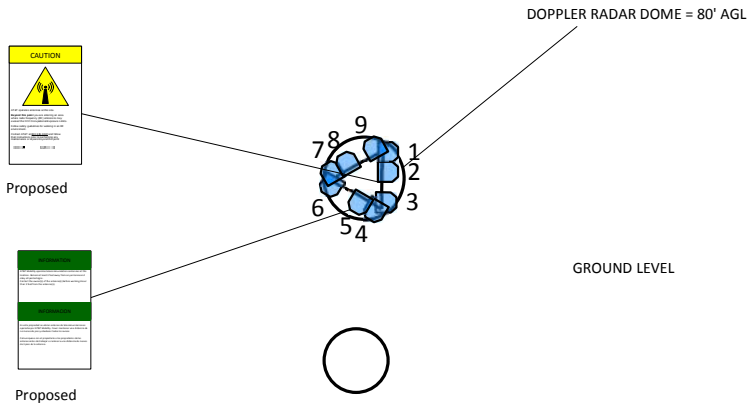
In the RF Emissions Simulations below all heights are reflected with respect to main site level. In most rooftop cases this is the height of the main rooftop and in other cases this can be ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas.

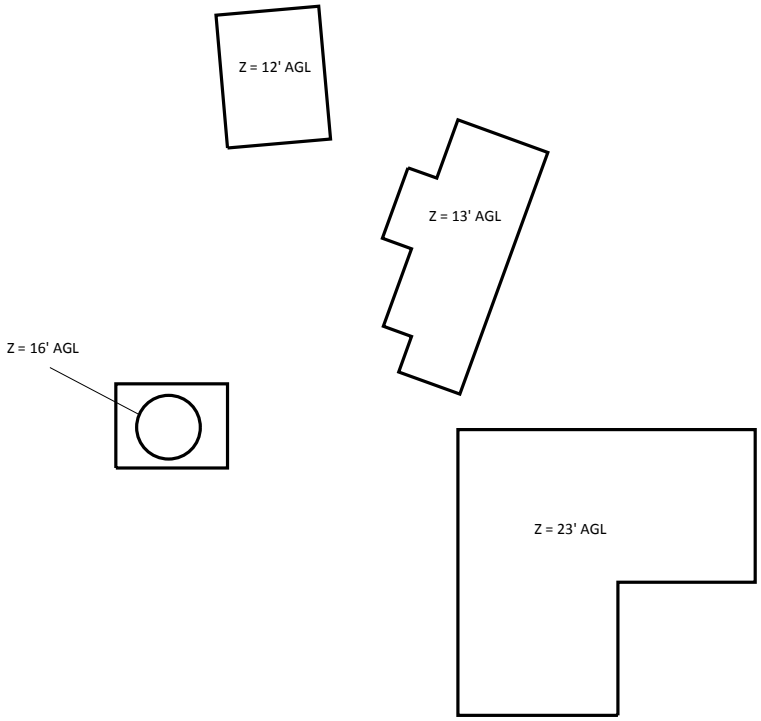
The Antenna Inventory heights are referenced to the same level.

The following diagrams are included:

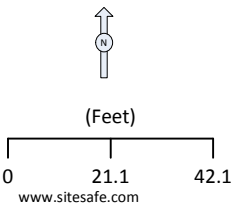
- Site Map
- RF Emissions Diagram
- Detail View
- Elevation View

Site Map For: Avon-Montevideo Road





% of FCC Public Exposure Limit
Spatial average 0' - 6'



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AT&T MOBILITY LLC	VERIZON WIRELESS	T-MOBILE	METROPCS	CRICKET COMMUNICATIONS	CLEARWIRE	SPRINT

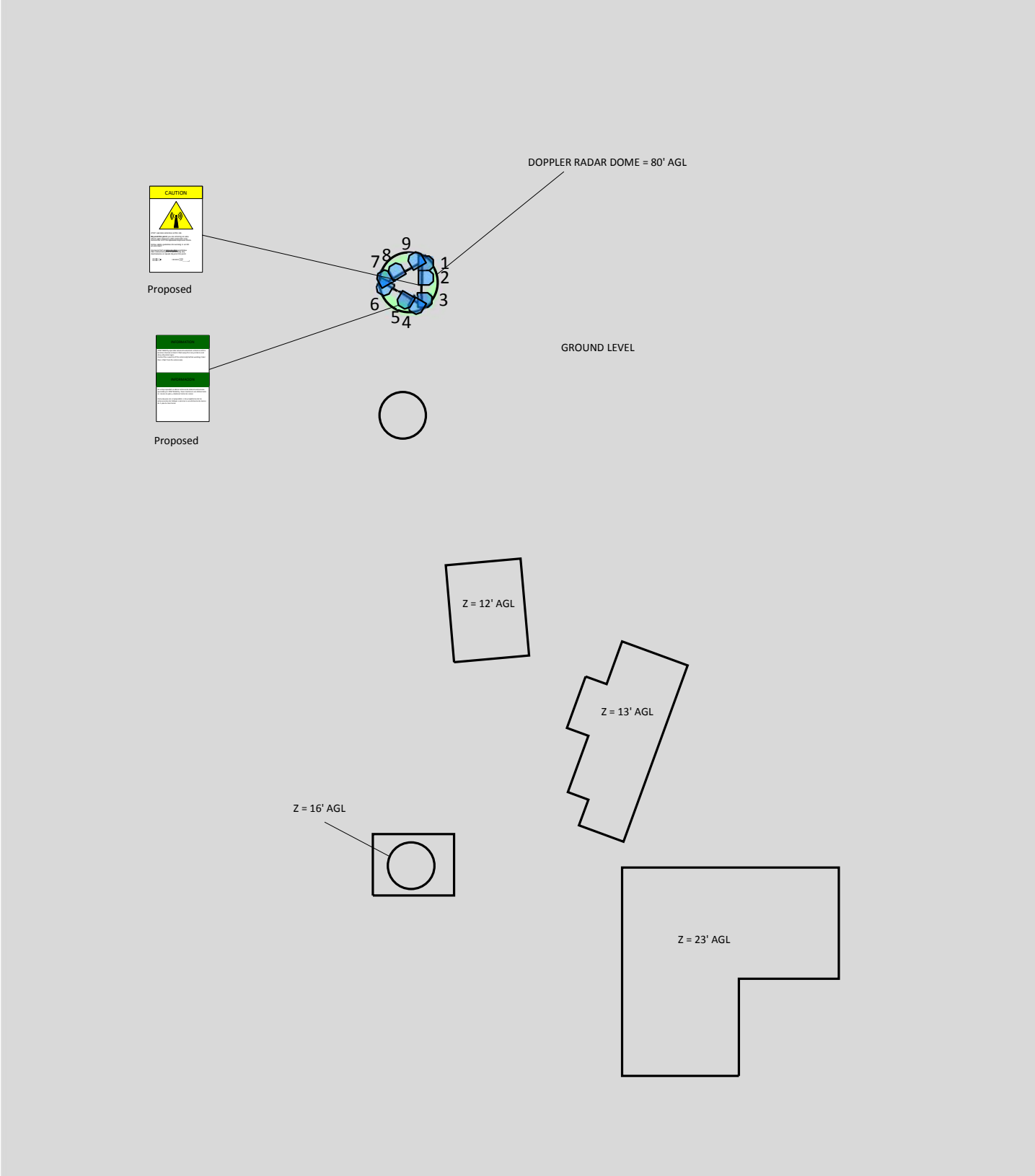
3 Antenna Inventory

The following antenna inventory on this and the following page, were obtained by the customer and were utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model	Type	TX Freq (MHz)	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	2G GSM Radio(s)	3G UMTS Radio(s)	4G Radio(s)	Total ERP (Watts)	X	Y	Z
1	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	90	57	8	15.504	0	1	0	304.9	208.5'	370.7'	70'
1	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	850	90	67	8	13.868	0	2	0	312	208.5'	370.7'	70'
2	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas OPA-65R-LCUU-H8	Panel	2300	90	63.7	7.7	14.66	0	0	1	698.5	208.5'	366.4'	70.1'
3	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	737	90	71	8	13.733	0	0	1	899.8	208.1'	359.7'	70'
3	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	90	57	8	15.504	0	0	1	1476.2	208.1'	359.7'	70'
4	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	850	210	67	8	13.868	0	2	0	312	205.6'	357.8'	70'
4	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	210	57	8	15.504	0	1	0	304.9	205.6'	357.8'	70'
5	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas OPA-65R-LCUU-H8	Panel	2300	210	63.7	7.7	14.66	0	0	1	698.5	202.3'	359.4'	70.1'
6	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	737	210	71	8	13.733	0	0	1	899.8	196'	363.4'	70'
6	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	210	57	8	15.504	0	0	1	1476.2	196'	363.4'	70'
7	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	850	330	67	8	13.868	0	2	0	312	196.1'	366.3'	70'
7	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	330	57	8	15.504	0	1	0	304.9	196.1'	366.3'	70'
8	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas OPA-65R-LCUU-H8	Panel	2300	330	63.7	7.7	14.66	0	0	1	698.5	199.6'	368.3'	70.1'
9	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	737	330	71	8	13.733	0	0	1	899.8	205.5'	371.7'	70'
9	AT&T MOBILITY LLC	Andrew SBNH-1D6565C	Panel	1900	330	57	8	15.504	0	0	1	1476.2	205.5'	371.7'	70'

NOTE: X, Y and Z indicate relative position of the bottom of the antenna to the origin location on the site, displayed in the model results diagram. Specifically, the Z reference indicates the bottom of the antenna height above the main site level unless otherwise indicated. The distance to the bottom of the antenna is calculated by subtracting half of the length of the antenna from the antenna centerline. Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. For other operators at this site the use of "Generic" as an antenna model or "Unknown" for a wireless operator means the information with regard to operator, their FCC license and/or antenna information was not available nor could it be secured while on site. Other operator's equipment, antenna models and powers used for modeling are based on obtained information or Sitesafe experience.

RF Emissions Simulation For: Avon-Montevideo Road



% of FCC Public Exposure Limit
Spatial average 0' - 6'

(Feet)

0 20.8 41.6

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>= 5000	>= 500	>= 100	>= 5	< 5

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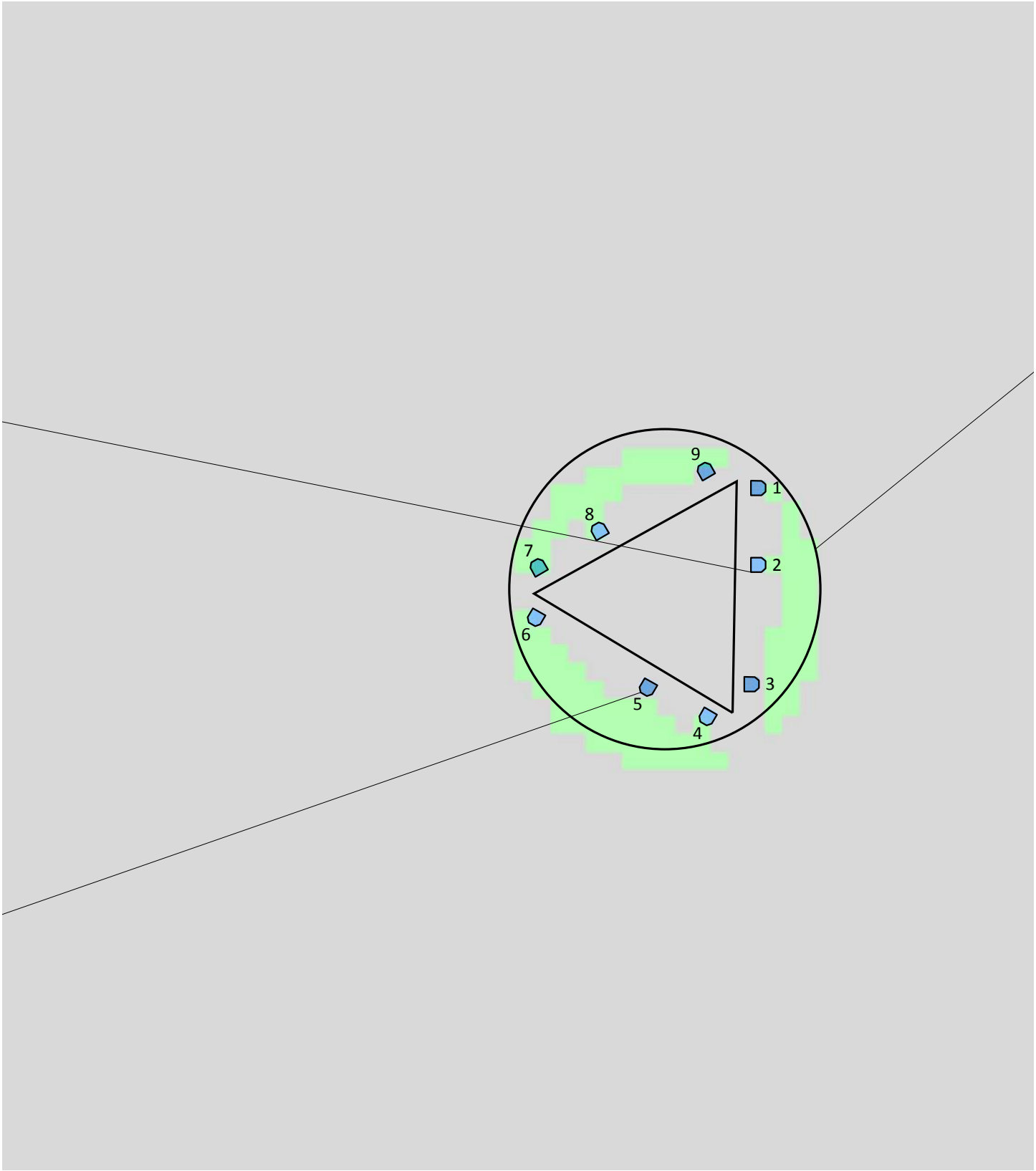
RF Emissions Simulation For: Avon-Montevideo Road
Detail View



% of FCC Public Exposure Limit
Spatial average 0' - 6'

(Feet)

0 3.9 7.7

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>= 5000	>= 500	>= 100	>= 5	< 5

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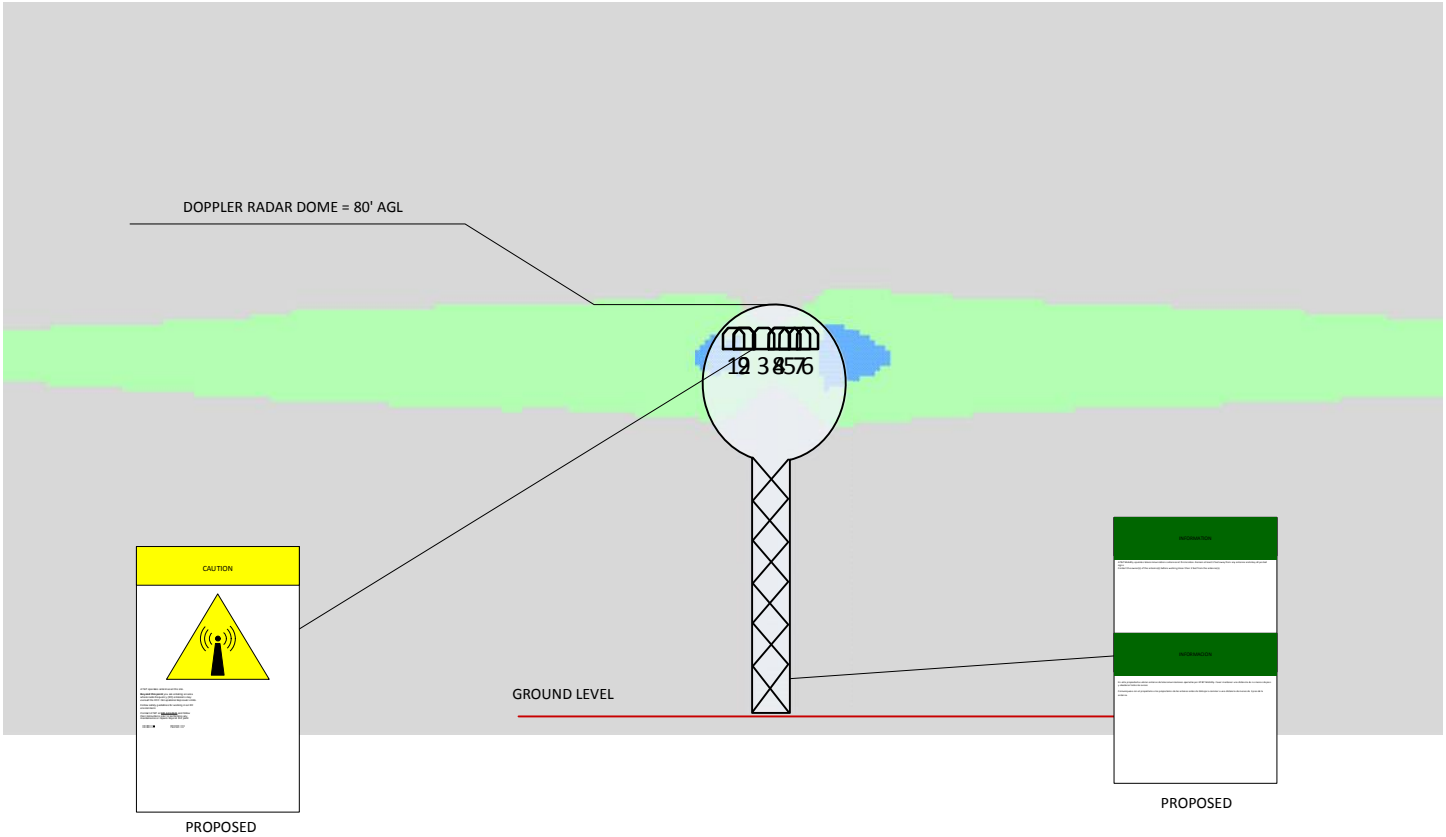
RF Emissions Simulation For: Avon-Montevideo Road
Elevation View



% of FCC Public Exposure Limit
Spatial average 0' - 6'

>= 5000	>= 500	>= 100	>= 5	< 5

AT&T MOBILITY LLC	VERIZON WIRELESS	T-MOBILE	METROPCS	CRICKET COMMUNICATIONS	CLEARWIRE	SPRINT

N

(Feet)

0 18.8 37.6

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5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the AT&T Mobility, LLC's proposed deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

The site will be made compliant if the following changes are implemented:

Site Access Location

Information Sign 1 required at the base of the tower.
Yellow caution 2 sign required near the antenna area.

Note: The base of the tower is in a public area. RF signage should be installed near the antennas.

AT&T Mobility, LLC Proposed Alpha Sector Location

No action required.

AT&T Mobility, LLC Proposed Beta Sector Location

No action required.

AT&T Mobility, LLC Proposed Gamma Sector Location

No action required.

6 Engineer Certification

The professional engineer whose seal appears on the cover of this document hereby certifies and affirms that:

I am registered as a Professional Engineer in the jurisdiction indicated in the professional engineering stamp on the cover of this document; and

That I am an employee of Sitesafe, Inc., in Arlington, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio-frequency Radiation; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Sam Cosgrove.

January 11, 2016

Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.

Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communication Commission (FCC) adopted regulations for the evaluating of the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

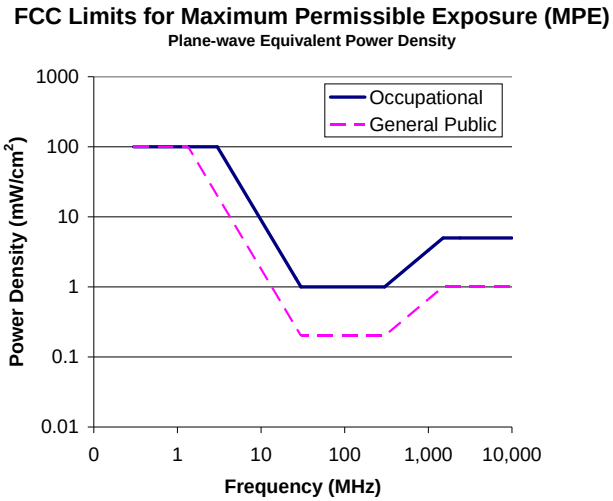
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $\|E\|^2$, $\|H\|^2$ or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1.0	6
300-1500	--	--	f/300	6
1500-100,000	--	--	5	6

Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $\|E\|^2$, $\|H\|^2$ or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	($180/f^2$)*	30
30-300	27.5	0.073	0.2	30
300-1500	--	--	f/1500	30
1500-100,000	--	--	1.0	30

f = frequency in MHz *Plane-wave equivalent power density

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

(1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;

(2) shall comply with occupational safety and health standards promulgated under this Act.

(b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lock Out Tag Out procedure aimed to control the unexpected energization or start up of machines when maintenance or service is being performed.

Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

General Maintenance Work: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a workers understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

RF Signage: Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

Maintain a 3 foot clearance from all antennas: There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram: Section 4 of this report contains an RF Diagram that outlines various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access is restricted and only properly trained individuals can gain access to the antenna locations.

Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

- Areas indicated as Gray are predicted to be below 5% of the MPE limits. **Gray represents areas more than 20 times below the most conservative exposure limit**.
- Green represents areas are predicted to be between 5% and 100% of the MPE limits. **Green areas are accessible to anyone**.
- Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. **Blue areas should be accessible only to RF trained workers**.
- Yellow represents areas predicted to exceed Occupational MPE limits. **Yellow areas should be accessible only to RF trained workers able to assess current exposure levels**.
- Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The site has been modeled with these assumptions to show the maximum RF energy density. Sitesafe believes this to be a *worst-case* analysis, based on best available data. Areas modeled to predict emissions greater than 100% of the applicable MPE level may not actually occur, but are shown as a *worst-case* prediction that could be realized real time. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Thus, at any time, if power density measurements were made, we believe the real-time measurements would indicate levels below those depicted in the RF emission diagram(s) in this report. By modeling in this way, Sitesafe has conservatively shown exclusion areas – areas that should not be entered without the use of a personal monitor, carriers reducing power, or performing real-time measurements to indicate real-time exposure levels.

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest Maximum Permissible Exposure (MPE), resulting in a conservative analysis.

Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site is safe or not with regards to Human Exposure to Radio Frequency Radiation from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – In a given direction, the relative gain of a transmitting antenna with respect to the maximum directivity of a half wave dipole multiplied by the net power accepted by the antenna from the connecting transmitter.

Gain (of an antenna) – The ratio of the maximum intensity in a given direction to the maximum radiation in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antennas as compared to an omni directional antenna.

General Population/Uncontrolled Environment – Defined by the FCC, as an area where exposure to RF energy may occur to persons who are **unaware** of the potential for exposure and who have no control of their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of antenna models to select a worst case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The maximum levels of RF exposure a person may be exposed to without harmful effect and with acceptable safety factor.

Occupational/Controlled Environment – Defined by the FCC, as an area where Radio Frequency Radiation (RFR) exposure may occur to persons who are **aware** of the

potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of Radio Frequency radiation on Humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency (RF) – The frequencies of electromagnetic waves which are used for radio communications. Approximately 3 kHz to 300 GHz.

Radio Frequency Exposure (RFE) – The amount of RF power density that a person is or might be exposed to.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average power density an average sized human will be exposed to at a location.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.

Appendix F – References

The following references can be followed for further information about RF Health and Safety.

Sitesafe, Inc.
http://www.sitesafe.com
FCC Radio Frequency Safety
http://www.fcc.gov/encyclopedia/radio-frequency-safety
National Council on Radiation Protection and Measurements (NCRP)
http://www.ncrponline.org
Institute of Electrical and Electronics Engineers, Inc., (IEEE)
http://www.ieee.org
American National Standards Institute (ANSI)
http://www.ansi.org
Environmental Protection Agency (EPA)
http://www.epa.gov/radtown/wireless-tech.html
National Institutes of Health (NIH)
http://www.niehs.nih.gov/health/topics/agents/emf/
Occupational Safety and Health Agency (OSHA)
http://www.osha.gov/SLTC/radiofrequencyradiation/
International Commission on Non-Ionizing Radiation Protection (ICNIRP)
http://www.icnirp.org
World Health Organization (WHO)
http://www.who.int/peh-emf/en/
National Cancer Institute
http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones
American Cancer Society (ACS)
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