

# ctc technology & energy

engineering & business consulting

March 4, 2022

Mr. Joseph Susca  
Senior Management Analyst  
Public Works Department  
City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232

Reference Approved Applications:

**AT&T Small Cell LDRAH-004A – 6174 Buckingham Parkway, U19-0443**  
**AT&T Small Cell LDRAH-001A – 5839 Green Valley Circle, U19-0439**  
**AT&T Small Cell LDRAH-005A – 5770 Uplander Way, U19-0441**

Dear Mr. Susca:

As per your request, we have performed an independent engineering review of 3 small cell applications submitted to Culver City by AT&T to determine (1) if the applications are compliant with the Federal Communications Commission's (FCC) definition for Small Wireless Facilities and (2) if they also fully comply with the FCC guidelines for Human Exposure to Radiofrequency Electromagnetic Fields.

The Federal Communications Commission has adopted uniform national standards for deployment for Small Wireless Facilities these standards are defined in their<sup>1</sup> rules and regulations contained the Code of Federal Regulations (CFR) - Title 47:

Wireless facilities that are consistent with the parameter specifications defined under Section 47 CFR 1.6002(l) are to be considered fully compliant with the FCC's definition of Small Wireless Facilities.

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<sup>1</sup> Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment Declaratory Ruling and Third Report and Order WT Docket No. 17-79; WC Docket No. 17-84, Sept 27, 2018, Washington, D.C.

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47 CFR 1.6002(l)

***Small wireless facilities*** are facilities that meet each of the following conditions:

(1) The facilities -

(i) Are mounted on structures 50 feet or less in height including their antennas as defined in [§ 1.1320\(d\)](#); or

(ii) Are mounted on structures no more than 10 percent taller than other adjacent structures;  
or

(iii) Do not extend existing structures on which they are located to a height of more than 50 feet or by more than 10 percent, whichever is greater;

(2) Each antenna associated with the deployment, excluding associated antenna equipment (as defined in the definition of antenna in [§ 1.1320\(d\)](#)), is no more than three cubic feet in volume;

(3) All other wireless equipment associated with the structure, including the wireless equipment associated with the antenna and any pre-existing associated equipment on the structure, is no more than 28 cubic feet in volume;

(4) The facilities do not require antenna structure registration under [part 17 of this chapter](#);

(5) The facilities are not located on Tribal lands, as defined under [36 CFR 800.16\(x\)](#); and

(6) The facilities do not result in human exposure to radiofrequency radiation in excess of the applicable safety standards specified in [§ 1.1307\(b\)](#).

In support of each of the applications, AT&T has submitted detailed, site-specific engineering design documents listing modifications proposed to the antenna mounting structures, as well as the technical specifications of the principal telecommunications equipment (i.e., antennas, electronic devices, and cabling) including all equipment that is designed to emit radio frequency (RF) signals.

Upon review of the application materials we have determined that each of the proposed facilities meets items (1)-(6) of the definition of Small Wireless Facility. With regard to radio exposure (item 6), we conducted an independent review of each of the small wireless facility applications

regarding its compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (pursuant to OET Bulletin 65 Edition 97-01).<sup>2</sup>

The supporting documentation AT&T includes engineering studies of RF field emissions prepared by the independent engineering consulting firm of Hammett & Edison (H&E). That study calculates the general public and occupational levels of RF exposure in the vicinity of the proposed facility and finds that it will be within the FCC's allowable exposure limits.

In summary, our independent calculations of RF exposure are fully consistent with those presented by H&E. Our findings for the 3 sites examined indicate that in the close proximity of those sites at or near the mount structure base at a 6 ft. elevation the maximum exposure for the public is less than 5% of the FCC permissible limit. At the antenna elevation of 38' the direct line-of-sight public radiation extends 12' from the pole, the closest building is 35' from the wireless facility. We are not aware of any existing wireless facilities in the proximity of the 3 sites that would produce cumulative radiation to a level where the FCC guidelines would be exceeded.

If you have any questions regarding our findings or require additional analysis, please contact me.

Regards,



Lee Afflerbach, P.E.  
Project Manager and Principal Engineer  
CTC Technology & Energy

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<sup>2</sup> Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, OET Bulletin 65, edition 97-01, FCC Office of Engineering & Technology. Washington, D.C. 20554,  
[https://transition.fcc.gov/Bureaus/Engineering\\_Technology/Documents/bulletins/oet65/oet65c.pdf](https://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet65/oet65c.pdf).