

Exhibit 15
Request for Special Temporary Authority
- Environmental Considerations -
prepared for
Polnet Communications, Ltd.
WTMY (AM) Sarasota, Florida
1280 kHz 0.1 kW-D 0.085 kW-N ND-U
Facility ID 51440

Introduction

Polnet Communications, Ltd. (“Polnet”) herein requests **Special Temporary Authority** (“STA”) to operate WTMY from the existing WSDV antenna system pending the completion of arrangements for a permanent replacement transmitter site. No physical changes are being proposed for the existing WSDV antenna system nor will new tower construction be required. Necessary diplexing equipment is already on site and the WTMY transmitter can be located in the existing WSDV transmitter room.

The use of existing transmitting locations, such as that specified herein, has been characterized as being environmentally preferable by the FCC, pursuant to **Note 1 of §1.1306** of the Commission’s Rules, therefore it is believed that this application may be categorically excluded from environmental processing and preparation of an Environmental Assessment is not required. A discussion of this proposal’s impact on human exposure to RF energy is discussed in the following.

RF Exposure Considerations

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission’s **OET Bulletin No. 65** (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in **§1.1310** of the Commission’s Rules. Under present Commission policy, a facility may be presumed to comply with the limits specified in **§1.1310** if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The “general population/uncontrolled” and “occupational / controlled” maximum permissible exposure limits specified limits for power density, electric field strength and magnetic field strength in **§1.1310** are:

- for WTMY on 1280 kHz: 100 mW/cm², 614 V/m, and 1.63 A/m respectively and
- for WSDV on 1450 kHz: 85.6 mW/cm², 568.3 V/m, and 1.51 A/m respectively.

“**Supplement A**” to OET Bulletin 65 (Edition 97-01) provides guidance to broadcasters for evaluating exposure to RF energy, and was employed herein as follows: To provide input parameters, inasmuch as this is proposed as a diplexed operation, the potential maximum contribution of each facility must be considered.

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WSDV is authorized to operate with 1 kW daytime and nighttime. WTMY is proposing to operate with a maximum of 0.1 kW into the same antenna tower using diplexing equipment. For estimation purposes, it will be assumed that a total of 1.1 kW will be fed to the tower.

The Tables of **Section I** of Supplement A of OET Bulletin 65 are scaled in terms of frequency, power, and height. Consideration must be given to the electrical element heights for each station. At the WSDV frequency, the tower is 148.5° in height (0.41 wavelengths). At the WTMY frequency, the WSDV tower is 131.1° in height (0.36 wavelengths). For the power levels, wavelengths, and frequencies involved, Section I, Table 2 and 3 of Supplement A of OET Bulletin 65, show the predicted distances for compliance. Therefore it can be determined through linear interpolation that the predicted “worst case” distance to maintain from a 1.1 kW AM station at the frequencies of interest to achieve compliance with the FCC exposure limits, is 1.84 meters.

According to information provided by representatives of WTMY, the tower is enclosed by a locked fence and is posted by RF exposure warning signs. It is also reported that the fences are located no closer than 1.85 meters from the closest point on the tower. As such, the minimum distance requirement is satisfied. Accordingly, it is believed that the impact of the proposed STA operation should not be considered to be a factor as defined under **§1.1307(b)** of the Commission’s Rules.

With respect to worker safety, a site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed in the vicinity of or on the tower. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. No worker will be permitted to climb an energized tower. On-site RF exposure measurements may be undertaken to establish more specifically the bounds of safe working areas.

Based on the preceding, it is believed that the instant STA proposal may be categorically excluded from environmental processing under **§1.1306** of the Commission’s Rules, hence preparation of an Environmental Assessment is not required.