

**EXHIBIT 15**  
**in support of**  
**Application for Construction Permit**  
**for a Minor Change in a licensed facility**  
**prepared June 2002 for**  
**Willow Farm, Inc.**  
**WNSH(AM) - Beverly, Massachusetts**  
**1570 kHz - 0.085 kW - 0.5 kW - DA-D**

This application has been prepared on behalf of Willow Farm, Inc., (“WFI”), licensee of Standard Broadcast station WNSH(AM), Beverly, Massachusetts, for a Construction Permit to operate non-directionally at a power less than 250 watts (and less than 141 mV/m@1km) during nighttime hours from its presently licensed daytime transmitter site. The instant application proposes no change in the presently licensed daytime operation. On the advice of FCC staff, a complete night study is not included herein, however, WFI presents the following in support of its request for authority to operate at 85 watts at night.

As presented in **Exhibit 10**, WFI submitted both the current distribution measurements, and a full non-directional proof of performance with its daytime license application, BL-20010529ACT, which was granted on September 04, 2001. The analysis presented by that data indicates that the measured RMS for the 350 watt non-directional operation authorized for the proof of performance measurements was expected to be 167.2 mV/m @ 1km (282 mV/m/kw/km), however as reported and tabulated in the license application, the actual measured non-directional RMS is calculated to be 116.5 mV/m @ 1 km (196.9 mV/m/kw/km), or approximately 30% below theoretical.

The closest protection in the licensed WNSH pattern is toward WPEP, Taunton, MA with a licensed Maximum Radiation of 27.0 mV/m at an elevation angle bracket of 61.6 - 71.9 degrees. WPEP is 77.2 km distant from the proposed site. WFI therefore believes that a nighttime non-directional power equal to 85 watts, assuming the measured antenna efficiency of 196.9 mV/m/kW/km as presented in BL-20010529ACT, may be granted without increasing its radiation toward any station which requires protection by the instant proposal. Further, the instant proposal will reduce radiation toward all other stations which would require study. WFI does not believe that it presently enters either the 50% or 25% RSS limitations at any other station, and is therefore not required to comply with the 10% ratchet back policy as described in §73.182(q) note 1.