

**Exhibit 17**  
**Request for Special Temporary Authority**  
**- Daytime Operation -**  
prepared for  
**Polnet Communications, Ltd.**  
WTMY (AM) Sarasota, Florida  
1280 kHz 0.1 kW-D 0.085 kW-N ND-U  
Facility ID 51440

**Proposed Daytime Operation**

Polnet Communications, Ltd. (“Polnet”) is herein requesting Special Temporary Authority (“STA”) to temporarily collocate the WTMY transmitting operation at another existing AM transmitter site because of an irreversible loss of the WTMY transmitter site lease. The proposed STA site is located well within WTMY’s city of license and approximately 8.8 km from the licensed site. Polnet has achieved and confirmed an arrangement with Citicasters Licenses, L.P., licensee of WSDV<sup>1</sup>, to employ the WSDV non-directional antenna using an existing, on-site diplexer which is already tuned close to the involved frequencies. Only minor readjustments should be necessary to effectuate the proposed temporary combined operations.

No physical changes are being proposed to the WSDV antenna system, other than the installation of the diplexing equipment. No changes will be made above the WSDV antenna base insulator. WSDV operates at 1 kW day and night using a folded unipole feed on a self-supporting tower. The WSDV facility can be described as follows:

**FCC Antenna Registration Number:** 1036798

**Coordinates:** 27° 20’ 11” N Latitude 82° 34’ 25” W Longitude (NAD-27)

**Overall Height Above Ground:** 85.9 meters

**Height above Base:** 85.29 meters

**Electrical Height at WSDV Frequency (1450 kHz):** 148.5°

**Electrical Height at WTMY Frequency (1280 kHz):** 131.1°

The estimated radiation efficiency for the proposed WTMY STA operation, after accounting for the differences in ground radial electrical length at this site (51.683 meters or 79.44° at 1280 kHz) would be approximately 326.45 mV/m/km/kW.

**Proposed Daytime Operating Power**

Under the Commission’s emergency antenna rules, 25% of the stated licensed WTMY 0.5 kW operation would be 0.125 kW. However, assuming a non-directional radiator for the limited purpose of this discussion, and using the licensed 70.3° radiator height for WTMY as a starting reference point, the field that would be radiated from a hypothetical WTMY non-directional 70.3° antenna would be 103.6 mV/m/km – less than that which would

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<sup>1</sup> WSDV (AM), 1450 kHz, Sarasota, Florida - Facility ID 48671

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be realized from a 90° radiator. Inasmuch as the electrical height of the WSDV antenna would be taller at the WTMY frequency (131.1°) than the presently used WTMY radiators, an operating power of less than 0.125 kW would be indicated for theoretical radiated field equivalence at this location.

Accordingly, if the proposed STA operation's 131.1° electrical height is considered, along with an appropriate correction factor for the electrically shorter ground system radial lengths at WSDV, achieving the equivalent of 25% power would require operating WTMY at 0.1 kW, which would provide a resulting field of 103.2 mV/m/km, which is approximately equivalent to a 25% field operation at the licensed WTMY site (103.6 mV/m/km), thus comporting with the Commission's emergency antenna rules. Accordingly, a daytime operating power of 0.1 kW is respectfully requested for the proposed STA operation.

**Other Considerations**

Contour Extension

The non-directional power of 0.1 kW from the WSDV tower location would provide reasonable coverage while containing the STA's 0.5 mV/m contour within the licensed facility's 0.5 mV/m contour over land areas, as shown in the included map of **Figure 1**<sup>2</sup>. As is also shown in **Figure 1**, some 0.5 mV/m contour extension occurs in the areas over the Gulf of Mexico due to the proximity of the STA site to the Gulf and the significantly higher salt water path conductivity. No actual coverage gain would be realized in this region since it involves unpopulated water areas, accordingly, it is requested that the relevant Policy provision be waived in this limited instance in order to retain as much of the station's existing viable coverage as possible.

Community Coverage

The attached **Figure 2** shows the proposed operation's daytime 5 mV/m principal community coverage contour over the city of license, Sarasota, Florida. It is estimated that 95% of the area and population of Sarasota would be covered by signal levels of 5 mV/m or higher.

Blanketing Interference

The 1000 mV/m blanketing contour of the proposed STA operation would extend 0.1 km, encompassing no population, based upon the 2000 U.S. Census SF1 Block Level data. There are 4,073 persons contained within the

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<sup>2</sup> The underlying basis for the ground conductivity values employed in all coverage predictions are from FCC Figure M-3. Detailed measurements of land distances from the sites were pulled from topographic maps at 10° intervals since the available M-3 data file boundaries are quite approximate in this area, yielding less precise results.

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proposed STA's 25 mV/m contour. Thus the provisions of Section 73.24(g) of the Commission's Rules are satisfied under this proposal.

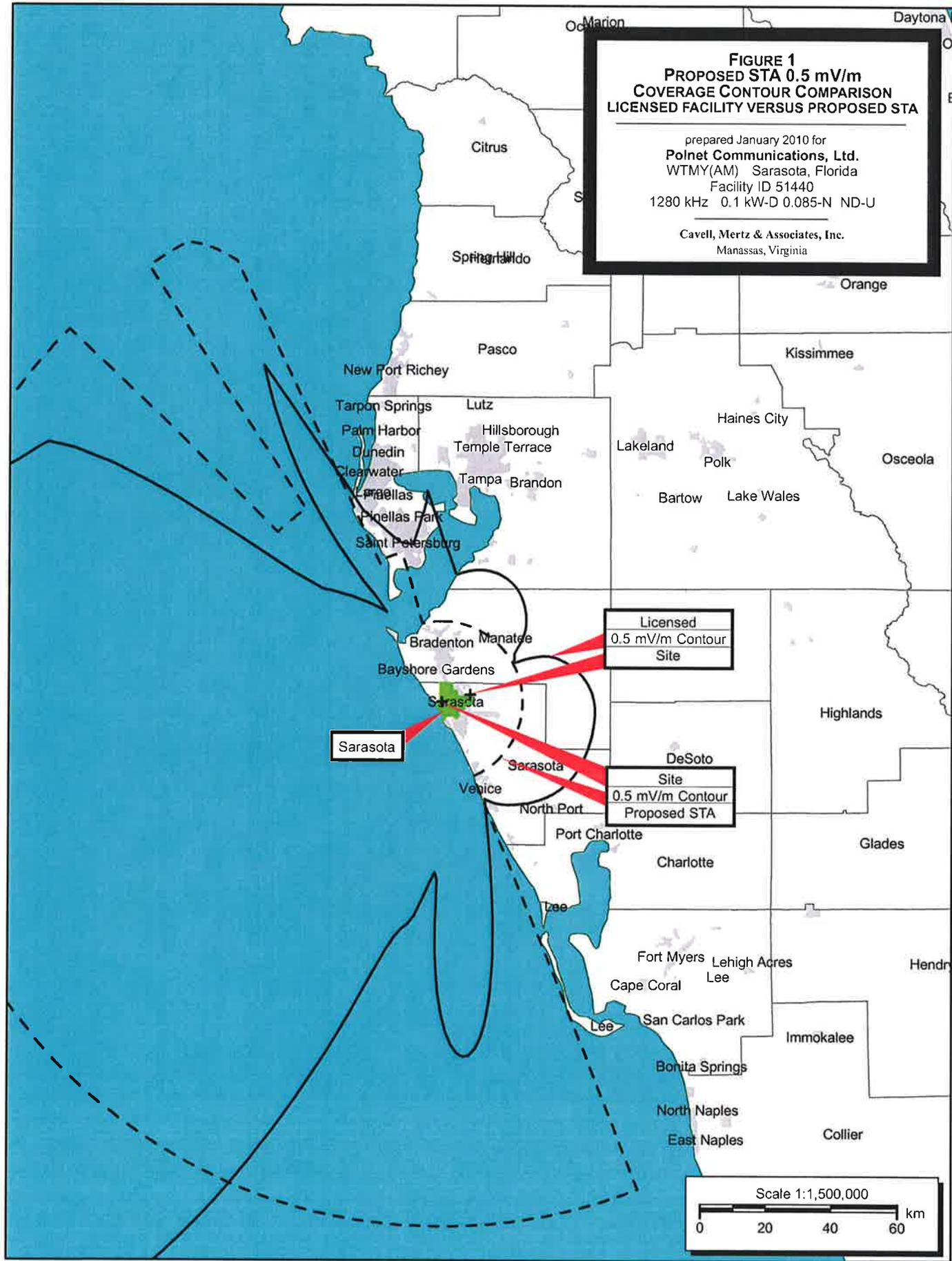
**Other Interference Considerations**

Inasmuch as the proposed STA operation's 0.5 mV/m contour is essentially maintained within the licensed 0.5 mV/m contour, no adverse impact is expected with respect to other stations on the same or the immediately adjacent frequencies. No other AM, FM or TV stations are located within 4 km of the proposed STA site. The nearest FCC monitoring station is located 194 km distant at Vero Beach, Florida. The proposed STA site is located more than 1400 km from the Mexican and Canadian borders and more than 1100 km from the nearest quiet zone. Thus, no adverse impact is expected to occur with respect to any other facility. Nevertheless, Polnet understands that, pursuant to Section 73.1635(b) of the Commission's rules, an STA can be modified or cancelled without prior notice or hearing should objectionable interference occur.

**FIGURE 1**  
**PROPOSED STA 0.5 mV/m**  
**COVERAGE CONTOUR COMPARISON**  
**LICENSED FACILITY VERSUS PROPOSED STA**

prepared January 2010 for  
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Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia



**FIGURE 2  
PROPOSED STA DAYTIME 5 mV/m  
PRINCIPAL COMMUNITY COVERAGE**

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