

Response to BMPFT-20160225AAF Construction Permit Condition #1

1 This construction permit authorizes the mounting of an antenna on a directional tower of the AM station identified below. Prior to installation of the antenna, the permittee shall notify the AM station licensee so that, if necessary, the AM station may determine operating power by the indirect method (see Section 73.51 of the Commission's Rules) and request a Special Temporary Authorization pursuant to Section 73.1635 of the Commission's Rules to operate with parameters at variance. The permittee must conduct a partial proof of performance as defined in Section 73.154 of the Commission's Rules both before and after construction to show that the AM station has not been adversely affected. If the operating parameters of the AM station differ from licensed values following the antenna installation, the results of the partial proof of performance shall be filed with the Commission by the AM station licensee using form FCC 302-AM. (See Section 1.30003 of the Commission's Rules.) The permittee must submit confirmation of completion of the requirements of this condition in the application for license to cover this construction permit. WDGY(AM), HUDSON, WI, 740 KHZ

We respectfully suggest that since WDGY is licensed under the Method of Moments, condition #3 placed on co-located W279DD (BMPFT-20160225AAM) should have been imposed instead:

3 This construction permit authorizes the mounting of an antenna on a directional tower of the AM station identified below. Prior to installation of the antenna, the permittee shall notify the AM station licensee so that, if necessary, the AM station may determine operating power by the indirect method (see Section 73.51 of the Commission's Rules) and request a Special Temporary Authorization pursuant to Section 73.1635 of the Commission's Rules to operate with parameters at variance. Following installation of the antenna, the permittee must make a base impedance measurement on the AM station as described in Section 73.151(c)(1) of the Commission's Rules. If the new measured base resistance and reactance values vary by more than +/- 2 ohms and +/- 4 percent from the corresponding modeled resistance and reactance values contained in the moment method proof underlying the AM station's current license, the AM station licensee must file form FCC 302-AM and all required data in accordance with the requirements of Section 1.30003(b)(2) of the Commission's Rules.) The permittee must submit confirmation of completion of the requirements of this condition in the application for license to cover this construction permit. Station WDGY(AM), Facility ID No. 6440, Hudson, WI.

The licensee of WDGY is owned by the same entity as the permittee of K288GR. The K288GR antenna and associated transmission line is mounted on the center (#2) tower of the WDGY three tower directional array (ASRN 1063037) . This tower is 78.5° at 740 KHz, with a measured self impedance of 39.06 +j13.25 ohms prior to the installation of the W279DD and K288GR antennas. The transmission lines for these stations cross the base insulator using two Kintronic Labs FMC-1.5 isocouplers. During the installation process an old 950 MHz STL antenna and transmission line were removed from the tower. The measured base impedance of the tower, following the completion of all work on April 26, 2016 was 38.2 +j12.8 ohms, well within the 2 ohm and 4% limits and closer to the model of 37.48 + j12.96 ohms. The antenna monitor showed less than 1% and 1° difference before and after. Therefore it can be said that the installation of the K288GR antenna and associated transmission line had no adverse effect on the operation of WDGY.