

WUVG-DT's construction permit (FCC File No. BMPCDT-20020118AAD) contained a special operating condition requiring partial "proof of performance" measurements in accordance with section 73.154(a) of the Commission's Rules be made on two AM broadcast stations, WQXI(AM) and WGKA(AM), prior to and after construction of WUVG-DT's tower.

Attached are measurements performed on the WQXI(AM) directional antenna system by the engineering firm of Lohnes and Culver. The Lohnes and Culver report concludes that there is "no evidence of a disruption of the WQXI(AM) directional pattern by re-radiation from the Richland Atlanta tower." Also attached is a copy of a letter signed by representatives of WQXI(AM), the tower owner, and Lohnes and Culver confirming that construction of the tower has had no impact on WQXI(AM). The Richland Atlanta tower is a master antenna facility and the addition of WUVG-DT involves no new construction or increase in tower height.

WUVG-DT respectfully requests that the partial proof of performance condition with respect to WGKA(AM) be deleted. WGKA(AM) is a non-directional facility located 1.4 km from WUVG-DT's site and is not within the 0.8 km distance specified in section 73.1692(c) of the Commission's rules. Therefore, before and after partial proof of performance measurements are not required. It should be noted that an application by WGKA(AM) to operate a directional antenna system within 3.2 km of WUVG-DT's site was dismissed by the Commission on January 14, 2000.