

November 11, 1998

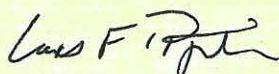
Federal Communications Commission
C/O Dennis Williams
1919 M Street, NW
Washington DC 20554

RECEIVED
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AUDIO SERVICES
DIVISION

Mr. Williams,

Enclosed in response to an FCC staff letter dated October 14, 1998 (1800B2-EAL) is an amendment to the pending direct power measurement application for WFXW (AM), Geneva, Illinois (BZ-980713AB). We believe that this amendment addresses the three concerns expressed in the letter. Any questions should be directed to our engineering consultant Mark Mueller at (708) 352-2166.

Sincerely,



Louis F. Pignatelli
President

**ENGINEERING STATEMENT FOR
VALLEY COMMUNICATIONS, INC.
W F X W (A M)
GENEVA, ILLINOIS**

This engineering statement was prepared in response to an FCC letter dated October 14, 1998 (1800B2-EAL) regarding the recently-filed WFXW (AM), Geneva, Illinois direct power measurement application (BZ-980713AB). Three issues were raised in the letter and are addressed here.

First, the nighttime 6°, 55°, 121° and 325° and daytime 55°, 151.5° and 211.5° measurement radials do not materially contribute to defining the pattern shape(s) and were not included in the partial proof report. We did take measurements on the 6°, 121°, 151.5°, 211.5° and 325° radials and they are attached to this statement. The 55° radial is not in any null, nor is it at a pattern maximum. The both patterns have a measured radial at 31.5° and 80° (a 48.5° span) and the 55° radial would not be included in a full antenna proof done today. We respectfully request that the 55° radial be deleted as unnecessary. If it is determined that the 55° is required, we request an additional 30 days to take the required readings. The other radial measurements provide proof that both patterns are properly adjusted.

Second, the antenna sample system was "approved" at least as far back as 1989 as shown on a copy of page two of the station license issued October 26, 1989 (BS-1989-S), attached. No changes were made to the system other than the replacement of the existing sample loops with Delta TCT current transformers. No change in the antenna monitor or sample lines was made and nothing which should have affected the sample system approval was done. The Delta TCT current transformers are appropriate for these 87° towers and provide reliable repeatable indications of the pattern operating parameters. In short, the previous sample system approval should still apply.

Third, the five 164-foot tall towers are not required to be lighted or marked by the FAA. No changes to the towers were made other than removal of the sample loops from approximately the 15-foot level, which did not change the height of the towers. Certainly, no alteration requiring notification was made. The towers are under the 200-foot absolute notification limit and are located in what is now a residential area of St. Charles, Illinois, approximately 2.2 miles west of the DuPage airport at a right angle to the main runway. Since the FAA has determined that no marking or lighting is required, and since the towers predate the main (long) runway, we believe that they do not require registration. Strict application of 14 CFR 77.13(a)(2) would seem to indicate that the 100:1 slope calculation sets the notification limit at about 116 feet (0.022 miles), but these towers were approved and built when the 50:1 slope applied, before the main runway was extended, and the FAA has not given any indication that this has changed. Therefore, we believe that 14 CFR 77.13(a)(2)(ii) continues to apply and they do not require registration. Having said all that, however, if it is now determined that registration is required, we will proceed to do that as soon as possible.

This engineering statement was prepared by me and is true and correct to the best of my knowledge and belief

November 9, 1998



Mark A. Mueller

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
WASHINGTON DC 20554

MASS MEDIA BUREAU
AUDIO SERVICES DIVISION
TECHNICAL PROCESSING GROUP
APPLICATION STATUS: (202) 418-2795
HOME PAGE: www.fcc.gov/mmb/asd/

OCT 14 1998¹

PROCESSING ENGINEER: Edward A Lubetzky
TELEPHONE: (202) 418-2660
FACSIMILE: (202) 418-1410
MAIL STOP: 1800B2-EAL
INTERNET ADDRESS: elubetzky@fcc.gov

Valley Communications, Inc.
1215 Fern Ave.
St. Charles, IL 60174-4425

In re: Valley Communications, Inc.
WFXW, Geneva, IL
BZ-980713AB

Gentlemen:

This is in reference to the above-captioned application for direct measurement of power accompanied with a partial proof of WFXW's directional antenna system

A preliminary engineering study of the partial proof indicates that it did not contain measurements of the nighttime 6°, 55°, 121° and 325° radials and the daytime 55°, 151.5° and 211.5° radials as required by 47 CFR § 73.154(a). In addition, the sample system does not comply with 47 CFR § 73.68 in that RG-8A/U cable is braided and does not have a solid outer conductor¹. In order to have the sampling system approved, Valley must show that the phase difference of signals at the monitor are less than 0.5° between the shortest and longest sample cable lengths due to temperature variations.

Pursuant to 47 CFR § 17.4(a), any proposed antenna structure or alteration to an existing antenna structure² requires registration with the Commission prior to construction or alteration. The towers are close to the Dupage airport. Our records indicate that the antenna structure has not been registered. Registration is accomplished by filing FCC Form 854, Application for Antenna Structure Registration, with the Commission's Support Services Branch (SSB) of the Wireless Telecommunications Bureau's Customer Services Division in Gettysburg, Pennsylvania. Please note that Federal Aviation Administration approval is necessary in order to obtain antenna structure registration. Upon registration, written notification (including the registration number) must be submitted to the Audio Services

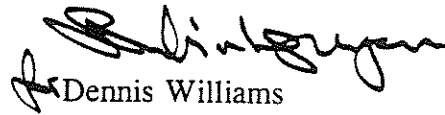
¹ See December 9, 1985 Public Notice referred to by 47 CFR § 73.68.

² Registration of all existing structures built before July 1, 1996 should have been completed. Alteration to an existing structure requires modification of that registration.

Division (ASD). If the antenna structure can not be registered within thirty days of the date of this letter, the applicant must notify the ASD in writing.

Accordingly, the above-captioned application IS HEREBY DISMISSED as patently defective. This action is taken pursuant to 47 CFR § 0.283.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Williams", written in a cursive style.

Dennis Williams
Assistant Chief
Audio Services Division
Mass Media Bureau

cc: Mark A. Mueller

Mueller Broadcast Design613 S. La Grange Road
La Grange, Illinois 60525**Field Intensity Measurements**

WFXW, Geneva, Illinois

Daytime Directional Antenna

151.5° True

1480 KHz

Loc	Orig. 1961	1998	Date	Time	Log Ratio	Dist. (KM)
17	28.5	28.0	03/19/1998	15:03	-0.0077	2.90
18	27.2	26.0	03/19/1998	15:08	-0.0196	3.06
19	29.3	28.0	03/19/1998	15:15	-0.0197	3.22
20	15.0	15.0	03/19/1998	15:21	0.0000	4.67
21	11.0	10.0	03/19/1998	15:33	-0.0414	6.76
22	9.9	10.0	03/19/1998	15:40	0.0044	7.32
23	5.3	5.0	03/19/1998	15:47	-0.0253	11.10
24	4.8	5.0	03/19/1998	15:55	0.0177	13.84
25	5.2	5.0	03/19/1998	16:03	-0.0170	15.77
26	3.6	4.0	03/19/1998	16:10	0.0458	18.19

Avg. Log Ratio: -0.0063

Average Ratio: 0.9856

Field Intensity Measurements

WFXW, Geneva, Illinois

Daytime Directional Antenna

211.5° True

1480 KHz

Loc	Orig. 1961	1998	Date	Time	Log Ratio	Dist. (KM)
16	105.00	100.00	03/19/1998	17:01	-0.0212	2.74
17	103.00	100.00	03/19/1998	16:59	-0.0128	2.90
18	100.00	99.00	03/19/1998	16:58	-0.0044	3.06
19	98.00	100.00	03/19/1998	16:56	0.0088	3.22
20	71.00	72.00	03/19/1998	16:52	0.0061	4.35
21	62.00	60.00	03/19/1998	16:48	-0.0142	5.63
22	37.00	35.00	03/19/1998	16:45	-0.0241	7.97
23	28.00	30.00	03/19/1998	16:40	0.0300	10.11
24	22.20	24.00	03/19/1998	16:33	0.0339	12.07

Avg. Log Ratio: 0.0002

Average Ratio: 1.0005

Mueller Broadcast Design613 S. La Grange Road
La Grange, Illinois 60525Field Intensity Measurements
WFXW, Geneva, Illinois

Nighttime Directional Antenna

6° True

1480 KHz

Loc	Orig. 1961	1998	Date	Time	Log Ratio	Dist. (KM)
20	76.00	70.00	03/20/1998	17:30	-0.0357	3.54
21	38.70	35.00	03/20/1998	17:18	-0.0436	4.99
22	28.70	27.00	03/20/1998	17:13	-0.0265	6.52
23	18.00	19.00	03/20/1998	17:08	0.0235	8.69
24	13.20	13.00	03/20/1998	17:03	-0.0066	10.30
25	14.00	11.00	03/20/1998	16:55	-0.1047	11.27
26	4.80	4.50	03/20/1998	16:43	-0.0280	15.69
27	3.40	3.30	03/20/1998	16:38	-0.0130	16.98
28	1.84	1.90	03/20/1998	16:32	0.0139	21.40
29	1.37	1.50	03/20/1998	16:15	0.0394	24.14

Avg. Log Ratio: -0.0181

Average Ratio: 0.9591

Field Intensity Measurements
WFXW, Geneva, Illinois

Nighttime Directional Antenna

121° True

1480 KHz

Loc	Orig. 1961	1998	Date	Time	Log Ratio	Dist. (KM)
19	5.00	5.20	03/26/1998	15:45	0.0170	3.22
20	2.80	3.70	03/26/1998	15:52	0.1210	5.07
21	1.10	2.50	03/26/1998	16:00	0.3565	6.20
22	2.70	1.60	03/26/1998	16:05	-0.2272	7.48
23	2.10	1.90	03/26/1998	16:10	-0.0435	8.85
24	1.90	1.80	03/26/1998	16:13	-0.0235	9.74
25	1.25	0.70	03/26/1998	16:17	-0.2518	10.62
26	0.80	0.85	03/26/1998	16:24	0.0263	12.71
27	0.60	0.50	03/26/1998	16:29	-0.0792	14.00
28	0.51	0.55	03/26/1998	16:40	0.0328	16.58

Avg. Log Ratio: -0.0071

Average Ratio: 0.9837

Mueller Broadcast Design

613 S. La Grange Road

La Grange, Illinois 60525

Field Intensity Measurements
WFXW, Geneva, IllinoisNighttime Directional Antenna
325° True 1480 KHz

Loc	Orig. 1961	1998	Date	Time	Log Ratio	Dist. (KM)
12	14.50	15.00	03/18/1998	16:12	0.0147	2.09
13	14.00	13.00	03/18/1998	16:15	-0.0322	2.25
15	10.00	10.00	03/18/1998	16:18	0.0000	2.57
18	7.20	7.00	03/18/1998	16:22	-0.0122	3.70
19	4.55	5.00	03/18/1998	16:28	0.0410	6.28
20	3.00	3.00	03/18/1998	16:34	0.0000	8.61
21	2.80	2.50	03/18/1998	16:38	-0.0492	10.78
22	2.50	2.00	03/18/1998	16:46	-0.0969	13.76
23	1.50	1.60	03/18/1998	16:52	0.0280	16.50
24	1.20	1.30	03/18/1998	16:57	0.0348	18.11

Avg. Log Ratio: -0.0072

Average Ratio: 0.9835

Oct. 19, 1998 6:28PM WFXW AM 1480 RADIO 630 513 1101

No. 7475 P. 2/5

FCC Form 352
May 1978

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
AM BROADCAST STATION LICENSE

File No. : BS-1989-S

Call Sign : WFXW

SEE:

VALLEY COMMUNICATIONS, INC.

1. Community of License : Geneva, IL
2. Transmitter location : 1215 Fern Ave
St. Charles, IL 60174

North latitude : 41° 54' 25"
West longitude : 88° 17' 43"

6. Antenna and ground system: Attached

3. Transmitter(s): Type Accepted. (See Sections 73.1660, 73.1665 and 73.1670 of the Commission's rules)

4. Main Studio location: (See Section 73.1125)

1215 Fern Ave
St. Charles, IL 60174

5. Remote control location:

7. Obstruction marking and lighting specifications - FCC Form 715, paragraphs: None Required

8. Frequency : 1480 kHz

9. Nominal power (kW) : 1.0 Day 0.5 Night

Antenna input power (kW) :

1.08 Day

☐ Non-directional antenna:

☒ Directional antenna : current 4.6 amperes; resistance 51 ohms.

0.54 Night

☐ Non-directional antenna:

☒ Directional antenna : current 3.25 amperes; resistance 51 ohms.

10. Hours of operation: Specified in Previous authorized

11. Conditions :

2-15-91 - Superseded to correct MP descriptions, common point values and operating parameters.

2-27-91 - Superseded to correct tower spacing Page 2.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent Acts, Treaties, and Commission rules made thereunder, and further subject to conditions set forth in this license,¹ the LICENSEE is hereby authorized to use and operate the radio transmitting apparatus herein described for the purpose of broadcasting for the term ending 3 AM Local Time December 1, 1996

The Commission reserves the right during said license period of terminating this license or making effective any change, or modification of this license which may be necessary to comply with any decision of the Commission rendered as a result of any hearing held under the rules of the Commission prior to the commencement of this license period or any decision rendered as a result of any such hearing which has been designated but not held, prior to the commencement of this license period.

The license is issued on the licensee's representation that the statements contained in the licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license and the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. This license is subject to the right of use or control by the Government of the United States conferred by Section 806 of the Communications Act of 1934, as amended.



File No. BS-1989-3

Call Sign: WFXW

Date: 8-22-89

1. DESCRIPTION OF DIRECTION ANTENNA SYSTEM

No. and Type of Elements: Five (5) uniform cross-section, guyed, series-excited, vertical steel radiators.

Height above Insulators: 160°(87°)

Overall Height: 164

Spacing and Orientation: Towers #1, #2, #4 & #5 at verticals of a parallelogram with the long sides spaced 203.2' (110°) on oriented 101.5° true. Short sides spaced 147.8' and oriented 31.5 true. Tower #3 is in line with East row of towers spaced 147.8'

Ground System consists of: 120-150' buried copper radials about the base of each tower. Radials, where overlapped, shortened and bonded.

Non-Directional Antenna: None Used.

2. THEORETICAL SPECIFICATIONS

	TOWER	SW(#1)	NW(#2)	S(#3)	EC(#4)	NE(#5)
Phasing:	Night			-9.5°	+180°	+9.5°
	Day	0°	+148°	--	+87°	-125°
Field Ratio:	Night			0.94	1.62	1.0
	Day	1.0	0.88	--	0.85	0.75

3. OPERATING SPECIFICATIONS**Phase Indication:***

Night			-57.2°	0°	57°
Day	31.5°	61.6°	--	0°	22.6°

Antenna Base Current Ratio:

Night			0.644	1.00	0.747
Day	1.129	1.173	--	1.00	0.863

Antenna Monitor Sample Current Ratio:

Night			0.649	1.00	0.680
Day	1.432	1.202	--	1.00	0.824

* As indicated by Potomac Instruments AM-19 (204) Antenna Monitor.

ANTENNA SAMPLING APPROVED UNDER SECTION 73.68(B) OF THE RULES