

**Family Life Ministries  
PO Box 506  
Bath, NY 14810**

March 19, 2003

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE:** Special Operating Condition #1, W216BR, BPFT-19990729TA  
Geneva, NY - Facility ID #93939

Dear Ms. Dortch,

The outstanding Construction Permit for W216BR issued March 21, 2000 contains as condition #1, the requirement for antenna impedance measurements on the antenna pattern of broadcast station WGVA(AM), 1240 kHz, Class 0C, 1kW, Geneva, NY.

The W216BR translator has been installed on a previously existing 18 meter metal self-supporting tower, located several feet from the WGVA-AM tower. WGVA, is also the owner of the antenna structure that W216BR has been installed on. The transmission line for W216BR is ½" Andrew LDF-4 hard line with a vertical run of approximately 15 meters, bonded to, and mounted on this 18 meter steel tower. Due to the near identical nature of the transmission line run for the tower, and given that the transmission line is electrically bonded to the tower in several places, electrically breaking up the line, making it unlikely to be a re-radiator of medium waves, the transmission line is likely to have no effect on the AM pattern and further study shouldn't be necessary and WGVA has noted no effect since W216BR's installation.

Since the stipulation states conditions that do not apply to licensee (but rather the attachment of electrically identical transmission line to an existing steel tower), then the stipulation, for that reason alone, should be removed. Taking into account of all the aforementioned reasons, Family Life Ministries respectfully requests the removal of the special operating conditions from the construction permit and the subsequent grant of the license application for W216BR, Geneva, NY.

Sincerely,

Lois L. Mills  
CSN International  
4002 N. 3300 E.

Twin Falls, ID