

FEB 24 2016

FCC Mail Room

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In Re: Dupage Radio, LLC
WCKG-AM 1530 kHz, Elmhurst, IL

BP-20151110AMR

**MOTION TO DENY APPLICATION FOR
POWER INCREASE, STANDARD BROADCAST STATION,
WCKG-AM, ELMHURST, ILLINOIS**

Comes now, Metro North Communications, Incorporated, Owner and Licensee of WLAK-AM New Holstein, WI. (hereinafter "Metro"). WLAK is licensed to the same channel as WCKG. Metro is very concerned of this application's negative effects of this application, as Metro asserts that substantial overlap will occur between the 0.025 mV/m signal of WCKG onto the WLAK 0.5 mV/m contours.

While the members of the Dubiel family have owned and operated WCKG since circa December 27, 2013, at no time during the prior ownership nor during the short history of their recent operation, have any augmentations been required in its directional pattern, according to the FCC database. WCKG-AM is located in a densely forested plat of land, near a merger of several expressways, with a substantial communications tower, in the immediate vicinity, which they do not own, nor control.

Suddenly, and Metro North alleges 'conveniently' in their November 2015 application filed by WCKG shows a severe drop-off in radiation, especially in the 10 degree radial, the very direction of WLAK's co-channel 1530 operation.

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Metro North is aware that the WCKG-AM site has been known, historically, to be one of the worst maintained sites in Chicagoland, including extreme vegetation, empty building components, considered to be a detriment to its operation. One major Chicagoland broadcaster referred to it recently, as a 'jungle'. Clearly, knowing this history, the ground system could have been damaged, removed or destroyed, over these many years of utter neglect.

Since existing towers are being utilized, the applicant did not have to provide photos of the tower site, however, with the carrier turned off at WLAK on February 17, 2016 at 9:00am CST, we were able to hear the WCKG-AM station from a car radio at Chilton, WI. The applicant certified that no replacement or repairs would be made to the existing WCKG ground system, and thus Metro extrapolates that the applicants are 100% confident of their predicted coverage. Metro disputes that assertion, also 100%.

Metro North questions the sudden, unexpected, drop-off on a proposed high-powered pattern which is looking exactly at the WLAK-AM New Holstein, WI tower site. This would be a convenient effort, to obtain 4,000 watts of power, by alleging there is a weak spot, towards the only radio signal that is clearly predicted to be overlapping. The application is also suspect, in that the only 'notch' in the coverage, is in the area of WLAK's coverage area. No other place in this application are any other directions affected, predicted or computed on the 1530 kHz coverage maps.

Since the exhibits and supplied measurements, were dated in the narrative which was supplied, we must offer sincere concerns of those reading dates, as the Elmhurst, IL weather archives indicated that 0.85 inches of rain fell on August 11, 2014 (all day event), .07 inches of rain fell on August 12, 2014 and 0.3 inches of rain fell on

August 23, 2014 (all day event).

While the applicant blames the Rock River, as a cause of the signal discrepancies, nothing in the application mentions the large, nearby communications tower, which we understand may be owned by the Illinois State Police, and what detuning efforts will be undertaken by this proposed power increase.

Metro wishes to inform the Commission, that no grant of this application should be made, until Metro can contract with its own Consulting Engineering firm, to make measurements, to confirm or further dispute the measurements submitted with the original application.

Metro considers the original application to be very deficient and incomplete, and must be denied, in its present form. Metro expects to have readings made on the radials between Metro's WLAK and WCKG's licensed 760 watt pattern, within the next 60 days.

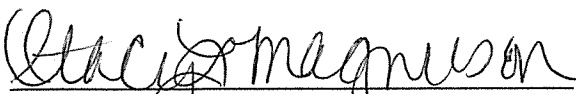
Respectfully submitted,



Mark Heller, President

February 17, 2016

Subscribed and Sworn before me, this 17th day of February, 2016

 My commission expires 10/12/19
Notary Public, Brown County, State of Wisconsin
(seal)

Metro North Communications, Incorporated
Attn: Mark Heller, President
P.O. Box 100
Denmark, WI 54208-0100

NOTICE OF MAIL SERVICE

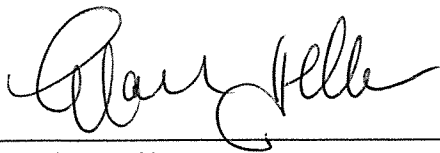
On February 18, 2016, I served a copy of **“MOTION TO DENY APPLICATION FOR POWER INCREASE, STANDARD BROADCAST STATION, WCKG-AM, ELMHURST, ILLINOIS”** upon the following, via US Mail, first class:

Atty. Mark A. Pearson *
ARC Law Group
1388 Haight Street #101
San Francisco, CA 94117

Dupage Radio LLC
PO Box 3162
Oak Brook, IL 60522

Marlene Dortsch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554 - VIA PRIORITY MAIL

* It appears that in fact, Atty. Pearson is admitted to the Bar in the State of California, and may not be admitted to practice in front of the FCC, at this time. However, as a main contact representative, Metro wanted to make sure he had a copy of the Motion.



Mark Heller