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August 11, 2021

VIA e-mail: james.bradshaw@fcc.gov, nazifa.sawez@fcc.gov

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Attn: James Bradshaw and Nazifa Sawez

Re: WLUV(AM), Loves Park, IL (Facility ID No. 2255), FCC Form 302-AM Application to Change Status to Non-Commercial Educational

Dear Ms. Dortch:

On behalf of my client VCY America, Inc., the proposed assignee of AM broadcast station WLUV(AM), Loves Park, IL, submitted herewith is an application on FCC Form 302-AM to change the status of WLUV(AM) from commercial to non-commercial educational. Form 302-AM cannot be submitted electronically. The application includes a showing that includes section II of FCC Form 340 and exhibits. This application is contingent upon grant of LMS File No. 0000156041 and consummation of the transaction contemplated therein.

This application is non-feeable.

Please do not hesitate to contact me should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Kathryne C. Dickerson". The signature is stylized with a large, looped initial "K".

Kathryne C. Dickerson

FOR
FCC
USE
ONLY

FCC 302-AM
APPLICATION FOR AM
BROADCAST STATION LICENSE

(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY

FILE NO.

SECTION I - APPLICANT FEE INFORMATION

1. PAYOR NAME (Last, First, Middle Initial)

MAILING ADDRESS (Line 1) (Maximum 35 characters)

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY

STATE OR COUNTRY (if foreign address)

ZIP CODE

TELEPHONE NUMBER (include area code)

CALL LETTERS

OTHER FCC IDENTIFIER (If applicable)

2. A. Is a fee submitted with this application?

☐

Yes

☐

No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

☐

Governmental Entity

☐

Noncommercial educational licensee

☐

Other (Please explain):

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A)

FEE TYPE CODE		

(B)

FEE MULTIPLE			
0	0	0	1

(C)

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)
\$

FOR FCC USE ONLY

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To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)

--	--	--

(B)

0	0	0	1
---	---	---	---

(C)

\$

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ADD ALL AMOUNTS SHOWN IN COLUMN C,
AND ENTER THE TOTAL HERE.
THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED
REMITTANCE.

TOTAL AMOUNT
REMITTED WITH THIS
APPLICATION

\$

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SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT		
MAILING ADDRESS		
CITY	STATE	ZIP CODE

2. This application is for:

- ☐ Commercial
 ☐ Noncommercial
☐ AM Directional
 ☐ AM Non-Directional

Call letters	Community of License	Construction Permit File No.	Modification of Construction Permit File No(s).	Expiration Date of Last Construction Permit
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

☐ Yes ☐ No

Exhibit No.

If No, explain in an Exhibit.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

☐ Yes ☐ No

Exhibit No.

If No, state exceptions in an Exhibit.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

☐ Yes ☐ No

Exhibit No.

If Yes, explain in an Exhibit.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

☐ Yes ☐ No

☐ Does not apply

Exhibit No.

If No, explain in an Exhibit.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☐ No

Exhibit No.

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

☐ Yes ☐ No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

☐ Yes ☐ No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name	Signature	
Title	Date	Telephone Number

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

☐

Station License

☐

Direct Measurement of Power

1. Facilities authorized in construction permit

Call Sign	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation	Power in kilowatts	
				Night	Day

2. Station location

State	City or Town
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3. Transmitter location

State	County	City or Town	Street address (or other identification)
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4. Main studio location

State	County	City or Town	Street address (or other identification)
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5. Remote control point location (specify only if authorized directional antenna)

State	County	City or Town	Street address (or other identification)
-------	--------	--------------	---

6. Has type-approved stereo generating equipment been installed?

☐

Yes

☐

No

7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68?

☐

Yes

☐

No

☐

Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed.

Exhibit No.

8. Operating constants:

RF common point or antenna current (in amperes) without modulation for night system	RF common point or antenna current (in amperes) without modulation for day system
Measured antenna or common point resistance (in ohms) at operating frequency Night Day	Measured antenna or common point reactance (in ohms) at operating frequency Night Day

Antenna indications for directional operation

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day

Manufacturer and type of antenna monitor:

SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lighting)	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">Exhibit No.</div>
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Excitation

☐

Series

☐

Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	°	'	"	West Longitude	°	'	"
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

11. Give reasons for the change in antenna or common point resistance.

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type)	Signature (check appropriate box below)	
Address (include ZIP Code)	Date	
	Telephone No. (Include Area Code)	

☐

Technical Director

☐

Registered Professional Engineer

☐

Chief Operator

☐

Technical Consultant

☐

Other (specify)

EXHIBIT TO FCC FORM 302-AM

Explanatory Statement

VCY America, Inc. ("VCY") is the proposed licensee of WLUV(AM), Loves Park, IL (Fac. ID No. 2255). *See* LMS File No. 0000156041. VCY seeks to change the status of WLUV(AM) from commercial to non-commercial educational, contingent upon grant of the referenced application and consummation of the transaction contemplated therein. No technical changes to WLUV(AM) are requested. Nonetheless, at the request of staff, VCY has completed the technical questions in Section III of the Form 302-AM. To do so, VCY relied upon information in the Commission's databases and the Application for Direct Measurement of Power filed by the station's current licensee and attached hereto.

NCE Certification

VCY is a non-stock, not-for-profit corporation organized for the purpose of providing educational, religious, and family programming to audiences in the United States. VCY's educational objectives include providing religious instruction and moral teaching; offering solutions to community problems such as teenage pregnancy, drug and alcohol abuse, and crime; and helping troubled youth find meaningful and productive lifestyles. Additionally, VCY uses its programming to teach citizenship, patriotism, peaceful conflict resolution and religious principles.

VCY will offer a wide variety of educational programming designed to meet the needs of interests of residents within the local community of license, including programs examining religious, economic, and social issues.

The Commission previously granted a broadcast application that found VCY qualified as a noncommercial educational entity with a qualifying educational program. *See* FCC File No. BPED-19930702MC. VCY will use WLUV(AM) to advance a program similar to that which the Commission found qualifying in VCY's previous application.

NOTE: The failure to include an explanatory providing full particulars in connection with a "No" response may result in dismissal of the application. See Instructions, paragraph L for additional information regarding completion of explanatory exhibits.

SECTION II - Legal and Financial

1.	Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Eligibility. Each application must answer "Yes" to one and "No" to two of the three following certifications. An applicant should not submit an explanatory exhibit in connection with these Question 2 "No" responses. The applicant certifies that it is: a. a nonprofit educational institution; or b. a governmental entity other than a school; or c. a nonprofit educational organization, other than described in a. or b.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Yes <input type="radio"/> No
3.	For applicants checking "Yes" to question 2(c) and applying for a new noncommercial educational television station only, the applicant certifies that the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural, and civic segments of the principal community to be served.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
4.	a. The applicant certifies that the Commission has previously granted a broadcast application identified here by file number that found this applicant qualified as a noncommercial educational entity with a qualifying educational program, and that the applicant will use the proposed station to advance a program similar to that the Commission has found qualifying in applicant's previous application. b. Applicants who answered "No" to Question 4(a), must include an exhibit that describes the applicant's educational objective and how the proposed station will be used to advance an educational program that will further that objective according to 47 C.F.R. Section 73.503 (for radio applicants) and 47 C.F.R. Section 73.621 (for television applicants).	<input checked="" type="radio"/> Yes <input type="radio"/> No FCC FileNumber BPED - 19930702MC [Exhibit 2]
5.	The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter, enabling statute, and/or other pertinent organizational document) permit the applicant to advance an educational program and that there is no provision in any of those documents that would restrict the applicant from advancing an educational program or complying with any Commission rule, policy, or provision of the Communications Act of 1934, as amended.	<input checked="" type="radio"/> Yes <input type="radio"/> No
6.	a. Parties to the Application. List separately each party to the application including, as applicable, the applicant, its officers, directors, five percent or greater stockholders, non-insulated partners, members, and all other persons and entities with attributable interests. If another entity hold an attributable interest in the applicant, list separately, as applicable, its officers, directors, five percent or greater stockholders, non-insulated partners, and board members. Create a separate row for each individual or entity. Attach additional pages if necessary. [Enter Parties/Owners Information] See assignment application. _____ _____ b. Applicant certifies that equity and financial interests not set forth above are non-attributable pursuant to 47 C.F.R. Section 73.3555 and that there are no agreements or understandings with any non-party that would give influence over the applicant's programming, personnel, or finances to that non-party.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 3]
7.	Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest pursuant to the notes to 47 C.F.R. Section 73.3555. See assignment application.	<input type="checkbox"/> N/A [Exhibit 4]
8.	Character Issues. Applicant certifies that neither applicant nor any party to the application has or	<input checked="" type="radio"/> Yes <input type="radio"/> No

	has had any interest in or connection with:	See Explanation in [Exhibit 5]
	a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or	
	b. any pending broadcast application in which character issues have been raised.	
9.	<p>Adverse Findings. Applicant certifies that, with respect to the applicant, any party to the application, and any non-party equity owner in the applicant, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p> <p>If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the the court or administrative body and the proceeding (by dates and file numbers), and a description of the disposition of the matter. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 C.F.R. Section 1.65, the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]
10.	<p>Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]
11.	<p>Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
12.	<p>Local Public Notice. Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
13.	<p>Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
14.	<p>Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
<p>QUESTIONS 15, 16 AND 17 APPLY ONLY TO APPLICANTS FOR NEW STATIONS. OTHER APPLICANTS CAN PROCEED TO QUESTION 18.</p>		
15.	<p>Financial. The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.</p> <p>If "No" to 15., answer question 16. and 17.</p>	<input type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]
16.	Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration?	<input type="radio"/> Yes <input type="radio"/> No
17.	Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision?	<input type="radio"/> Yes <input type="radio"/> No
<p>NOTE: If Yes to 16. or 17., the application cannot be granted unconditionally until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on the applicant's part is required. If the applicant relies on funds from a source specified in Question 17., the applicant must advise the Commission when the funds are committed or appropriated. This should be accomplished by letter amendment to the application. Applicants should take note that the Commission's construction period is not considered "tolled" by funding difficulties and that any permit granted conditionally on funding will expire if the station is not constructed for any reason, including lack of funding.</p>		
<p>QUESTIONS 18 AND 19 DO NOT APPLY TO APPLICATIONS FOR NEW STATIONS. APPLICANTS FOR NEW FM STATIONS CAN PROCEED TO SECTION III. APPLICANTS FOR NEW TV STATIONS CAN PROCEED TO SECTION IV.</p>		

Holding Period.

18.	Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b).	<input checked="" type="radio"/> Yes <input type="radio"/> No
	If "No," answer a. and b. below. If applicant answers "No" to 18. above and cannot answer "Yes" to either a. or b. below, the application is unacceptable.	
a.	Applicant certifies that the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.	<input type="radio"/> Yes <input type="radio"/> No
b.	Applicant certifies that although it proposes to downgrade service to the area on which the Section 307(b) preference was based, applicant has provided full service to that area for a period of four years of on-air operations.	<input type="radio"/> Yes <input type="radio"/> No
19.	Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003.	<input checked="" type="radio"/> Yes <input type="radio"/> No
	If "No," applicant must be able to answer "Yes" to a. below or provide an exhibit that makes a compelling showing that the downgrade would be in the public interest.	
a.	Applicant certifies that the population and area within the proposed service contour (60 dBu (FM) or grade B (TV)) are greater than or equivalent to those authorized.	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 9]

Section III

Fair Distribution of Service Pursuant to 47 U.S.C. Section 307(b) (New and Major Changes to FM Radio Only) (Other applicants can proceed to Section IV).

1.	Applicant certifies that it provides a first aural (reception) service. Applicants answering "Yes" must provide an Exhibit.	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 10]
2.	Applicant certifies that (1) it is a Tribal Applicant, as defined in 47 C.F.R. Section 73.7000; (2) the facilities proposed in this Application will provide Tribal Coverage, as defined in 47 C.F.R. Section 73.7000, of Tribal Lands occupied by the applicant Tribe(s); (3) the proposed community of license is located on Tribal Lands, as defined in 47 C.F.R. Section 73.7000; and (4) the proposed facility would be the first local tribal-owned noncommercial educational transmission service at the proposed community of license. Applicants answering "Yes" must provide an Exhibit.	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 11]
3.	Applicant certifies that the proposed station will provide a first noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1 mV/m) service contour and (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 12]
4.	Applicant certifies that the proposed station will provide a second noncommercial educational aural service, or an aggregated first and second noncommercial educational aural service, to (a) at least 10 percent of the people residing within the station's 60 dBu (1 mV/m) service contour and (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 13]

Section IV Point System Factors - New and Major Change Applications Only (used to select among mutually exclusive radio and television applications for new stations and major modifications) **NOTE:** Applicants will not receive any additional points for amendments made after the close of the application filing window.

1.	Established Local Applicant: Applicant certifies that for at least the 24 months immediately prior to application, and continuing through the present, it qualifies as a local applicant pursuant to 47 C.F.R. Section 73.7000, that its governing documents require that such localism be maintained, and that it has placed documentation of its qualifications as an established local applicant in a local public inspection file and has submitted to the Commission copies of the documentation.	<input type="radio"/> Yes <input type="radio"/> No
2.	Diversity of Ownership: (a) Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized station (comparing radio and television to television, including non-fill-in translator stations other than those identified in 2(b) below) in which any party to the application has an attributable interest as defined in 47 C.F.R. Section 73.3555, that its governing documents require that such diversity be maintained, and	<input type="radio"/> Yes <input type="radio"/> No

APPLICATION FOR DIRECT MEASUREMENT OF POWER

AM BROADCAST STATION
WLUV – LOVES PARK, ILLINOIS
1520 KHz / 0.5 kW ND-D / 0.01 kW ND-N
FACILITY ID: 2255

SUSAN S. BUCKWALTER, ADMINISTRATOR

JUNE, 2020



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JEREMY RUCK & ASSOCIATES, INC.

P.O. Box 415
221 S. 1st Avenue
Canton, IL 61520

Tel: 309.647.1200
Fax: 855.332.9537
jeremyruck.com

6.9.2020

APPLICATION FOR DIRECT MEASUREMENT OF POWER

The following engineering statement and attached exhibits have been prepared for **Susan S. Buckwalter** ("Buckwalter"), licensee of AM broadcast station WLUV at Loves Park, Illinois, and are in support of her application for direct measurement of power.¹ This application is being filed following repairs to the folded unipole feed system and an associated minor change in the antenna impedance.

WLUV is authorized to operate on a frequency of 1520 kHz with a daytime nominal power of 0.500 kW, and a nighttime nominal power of 12 Watts. The licensed radiator electrical height is 163 degrees. The efficiency of the antenna is nominally 360.7 mV/m/kW at one kilometer, but has been restricted by the Commission to 317.04 mV/m/kW at one kilometer. As a result, the antenna input power has been adjusted to 0.386 kW daytime, and 0.0097 kW nighttime. These values round to 0.39 and 0.01 kW respectively. It should be noted that the nominal power values assigned to WLUV of 0.5 kW daytime and 0.012 kW nighttime, have been entered into section 1 on page 4 of the attached engineering section of FCC Form 302-AM. The antenna current values entered into section 8, "operating constants", reflect the restricted power values.

WLUV operates with a folded unipole feed system. As such, this is considered a shunt feed. Instability in the operation was observed, leading to the discovery of damage to the skirt. The skirt connections and components were cleaned, and repaired, as necessary. The attachment point to the tower was adjusted slightly in order to bring the resistance component of the

¹ The Facility ID for WLUV at Loves Park, Illinois is 2255

JEREMY RUCK & ASSOCIATES, INC.

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impedance back as close as possible to the licensed resistance of 60 ohms. As the measured data indicate, the antenna resistance is set at 61 ohms.

Attached to this engineering, following exhibit E-1, is a sweep of the antenna impedance. This sweep was performed at the carrier frequency and at 5 kHz increments either side of the carrier out to 30 kHz from carrier. The impedance was measured using an Array Solutions Power AIM-120 network analyzer. The reactance values listed both on the form page and on the graph do not require correction.

Preceding the sweep of the antenna impedance is Exhibit E-1. This exhibit is a vertical sketch of the tower, including the skirt, as well as the antenna for co-located FM translator station W287BY at Rockford, Illinois.² The tower is grounded, thus the transmission line for W287BY is directly bonded to the tower. No additional isolation circuits are required. The tower comprising the antenna system for WLUV has been registered with the Commission, and is assigned 1019526 as its Antenna Structure Registration Number.

Buckwalter will continue to coordinate with all other users of the site to ensure that workers and other personnel having access to the tower are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power or cessation of operation.

² The Facility ID for W287BY at Rockford, Illinois is 151837.

JEREMY RUCK & ASSOCIATES, INC.

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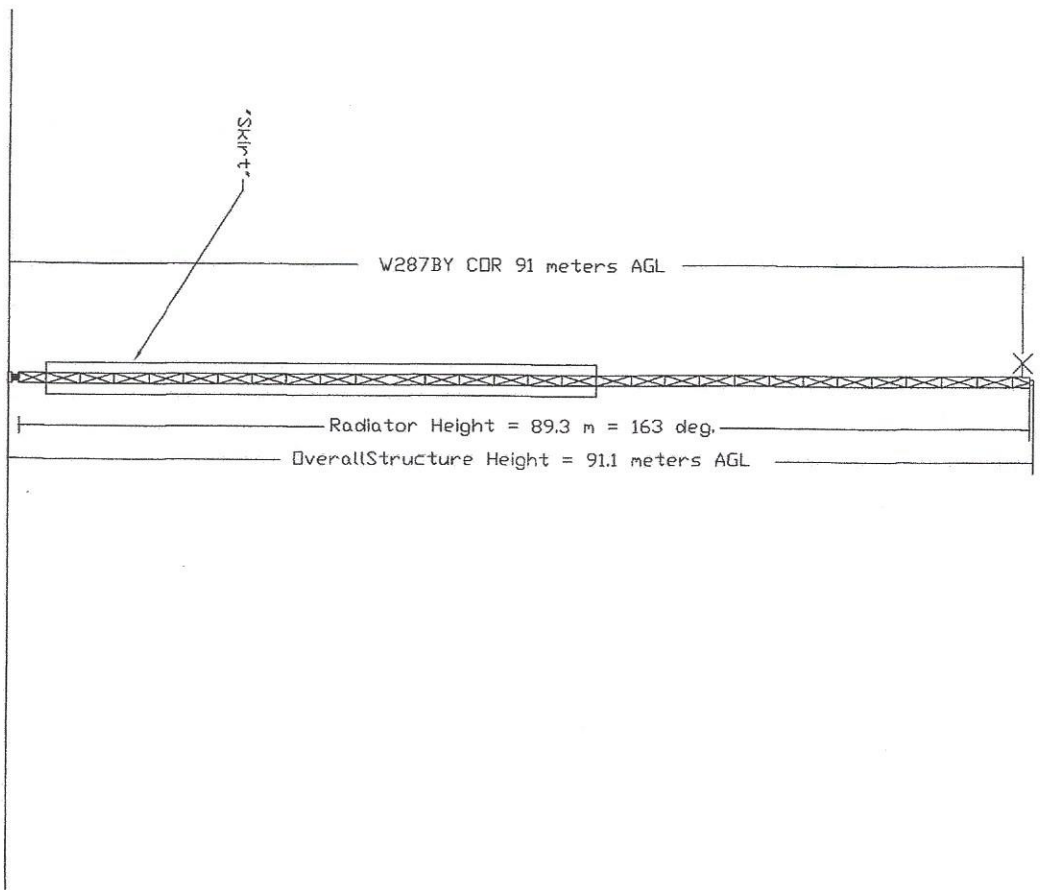
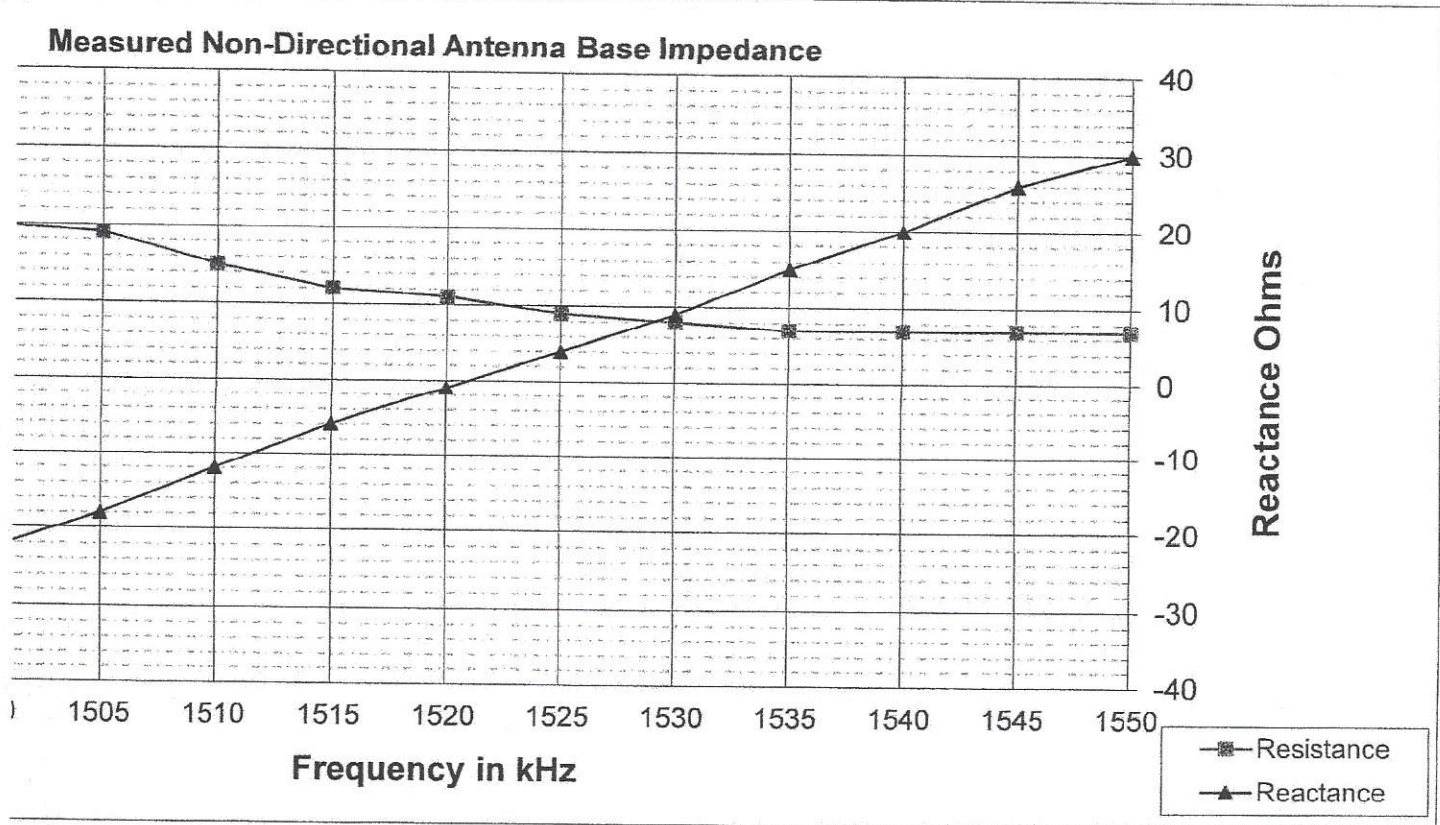


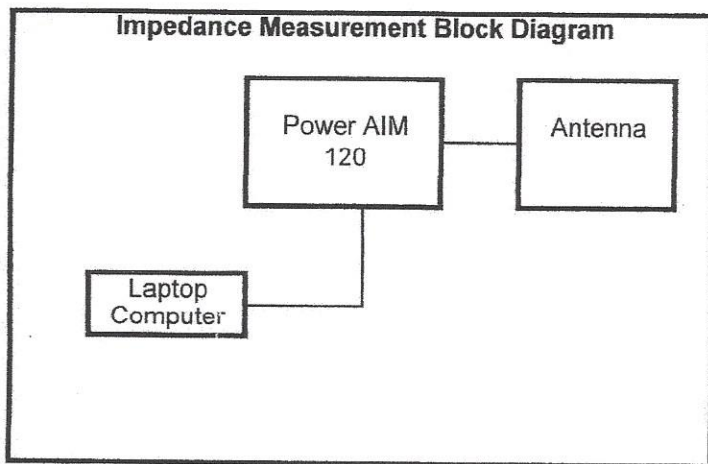
Exhibit E-1
WLV Vertical Plan Drawing

SIZE	FSCM NO.	DWG NO.	REV
A		200609-1	
SCALE	NTS	SHEET	

WLUV Measured Antenna Impedance



Reactance
-28
-26
-23
-18
-12
-6
-1
4
9
15
20
26
30



Facility Information	
Callsign:	WLUV
Facility ID:	2255
Location:	Loves Park, Illinois
Frequency:	1520 kHz
Nominal Power:	0.50 kW D/0.012 kW N
Antenna Mode:	ND-U

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