



Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, NW | Washington, DC 20036 | tel 202.663.8000 | fax 202.663.8007

Miles S. Mason
tel: +1.202.663.8195
miles.mason@pillsburylaw.com

November 9, 2021

Via Email Correspondence

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, D.C. 20554

RE: Request for Extension of Experiment Authorization and Waiver
Universal Media Access – KSJO-FM, LLC

Dear Ms. Dortch:

Universal Media Access - KSJO-FM, LLC (“UMA”), the licensee of full power FM radio station KSJO(FM), San Jose, CA (Facility ID 4117) and FM booster KSJO-FM1, Pleasanton, CA (Facility ID 203495), by and through counsel, and pursuant to 47 C.F.R. § 5.203 and 47 C.F.R. § 74.1231(i), hereby requests an extension of the Experimental Authorization originally granted on February 8, 2021 (BESTA-20210203AAI) (the “Authorization”) in order to continue the activity specified in the Authorization. On May 5, 2021, UMA requested an extension of the Authorization (BESTA-20210505AAJ), which was granted on May 7, 2021. On July 27, 2021, UMA requested a further extension of the Authorization, which was granted on August 10, 2021. Currently, the Authorization is set to expire on November 10, 2021.

As set forth herein, UMA seeks additional time to continue using the facilities set forth in the Authorization, as modified. This extension will enable other members of the broader radio industry ecosystem to observe HD2, HD3, HD4 synchronization between the Main and Booster signals available from Xperi and Gates Air, and will enable additional observations of various programming-related operation and content enhancements identified in the first phase of this project.

Additionally, the request extension of the Authorization will also permit the implementation of modified software developed by Xperi to eliminate short audio dropouts on the HD2 programming as described in the Roberson and Associates, LLC [Technical Report](#) filed with the FCC on September 17, 2021.

As discussed in the Roberson Report (at pg. 3), there were short audio dropouts in the HD2 transition zone due to the use of unsynchronized HD Exporters. UMA has been advised that software updates are being developed that are expected to resolve this issue, and that facilities authorized by the Authorization provide an ideal way to test this software. The elimination of the audio dropouts is an important goal to resolve during the testing phase, and it will further inform the FCC's efforts in the ongoing rulemaking proceeding (MB Docket No. 20-401, RM-11854).

Because 47 C.F.R. § 74.1231(i) prohibits FM boosters from originating programming, UMA also requests an extension of the waiver of this rule for the duration of the extended experimental authorization for purposes of conducting the experiment. In addition, UMA respectfully requests an extension of the waiver of Section 5.203(c)(4) of the Commission's rules to be able to transmit Station KSJO's complete programming, including commercial programming.

Grant of the instant request for extension of the Authorization will serve the public interest. An extension of the Authorization for an additional ninety (90) days will enable various stakeholders to observe and participate in the experimental operations of the Zonercasting™ system. The additional time will permit UMA to explore alternative methods to resolve terrain shielding areas which will lead to more efficient use of the Zonercasting™ system should the FCC authorize wide-scale use in the future. Finally, grant of the instant request will provide additional time for the parties to implement software update resolve the short audio dropouts.

Should there be any questions concerning this request, please contact me at (202) 663-8195 or miles.mason@pillsburylaw.com, or Bert Goldman at (214) 395-5067 or bert@bgoldman.net.

Sincerely,

/s/ Miles S. Mason

Miles S. Mason

*Counsel for Universal Media Access -
KSJO-FM, LLC*

Cc (via email):

Jim Bradshaw, james.bradshaw@fcc.gov

Rudy Bonacci, rodolpho.bonacci@fcc.gov