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February 14, 2022

## VIA EMAIL

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
Attn: Priscilla Lee, Audio Division, Media Bureau

Dear Ms. Dortch:

On behalf of the Florida Gulf Coast University Board of Trustees (“FGCU”), licensee of noncommercial educational FM radio station WGCU-FM, Fort Myers, Florida, and pursuant to Section 5.203 of the Commission’s rules, 47 C.F.R. § 5.203, this letter respectfully requests extension of the station’s experimental authority for one year. This would allow WGCU-FM to continue to operate full time with asymmetrical hybrid digital sideband power. FGCU respectfully submits that the public interest will be well served by the requested experimental authorization by permitting FGCU to obtain additional experience and provide improved service to its local community with IBOC operation including asymmetrical power levels in the digital sidebands. An interim report detailing the progress of the experimental operation thus far is attached hereto.

FGCU hereby certifies that neither FGCU nor any party to this application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. FGCU is a noncommercial educational licensee and operates WGCU-FM on a noncommercial basis. Moreover, FGCU qualifies as a governmental entity. The licensee is therefore exempt from FCC filing fee and regulatory fee requirements for WGCU-FM pursuant to Sections 1.116 and 1.1162 of the Commission’s rules. Please direct any questions regarding this matter to my attention.

Sincerely,



Derek Teslik  
Counsel to Florida Gulf Coast University Board of  
Trustees

REPORT ON IMPLEMENTATION OF ASYMMETRICAL  
SIDE BAND INJECTION IN HYBRID FM IBOC SYSTEM

FM BROADCAST STATION WGPU-FM  
(FACILITY ID 69042)  
FORT MYERS, FLORIDA  
CHANNEL 211C1, 90.1 MHz

1. The instant report was prepared on behalf of The Florida Gulf Coast University Board of Trustees, licensee of FM Broadcast Station WGPU-FM, Fort Myers, Florida (Facility ID No. 69042).

2. WGPU-FM is licensed for analog FM operation on Channel 211C1 (90.1 MHz), with a nominal non-directional effective radiated power of 100 kW with an antenna height above average terrain of 248 m.\* WGPU-FM received FCC authorization for experimental authority for in-band on-channel (IBOC) operation with asymmetric power level in the digital sidebands on March 30, 2020. See FCC File No. 20200213ABN. The IBOC system is authorized with a lower sideband level of -14 dBc and an upper sideband level of -10 dBc.†

3. The results of the experimental IBOC operation for WGPU-FM continue to show positive results with no interference complaints since the implementation of the experimental asymmetrical sideband IBOC operation.‡

4. With the asymmetrical sideband IBOC operation, WGPU-FM is able to broadcast a second high-fidelity classical music service (HD2) that would otherwise be more limited in reach at the -14 dBc symmetrical sideband level. This format is not found anywhere else in the area. In addition, WGPU-FM is able to provide a third audio channel (HD3) that is employed for long form news and special events as needed. In view of the continued success of the operation, WGPU-FM would like to continue its

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\* See FCC File No. BMLED-19990823KA.

† WGPU-FM originally launched IBOC service at -20 dBc in March 2008. Subsequently, IBOC service at -14 dBc was authorized by the FCC in April 2012.

‡ WGPU-FM first received experimental authority for its asymmetrical IBOC operation in March 2019.

service and observations of the asymmetrical sideband IBOC system to facilitate potentially greater implementation for the industry in the future.



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