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February 18, 2022

VIA EMAIL

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St NE
Washington, D.C. 20002
audiofilings@fcc.gov

**Re: Perry Broadcasting of Southwest Oklahoma, Inc. – KVSP, Anadarko, Oklahoma
(Facility ID No. 2189) – Request to Operate via IBOC Asymmetrical Sideband**

Dear Ms. Dortch:

Perry Broadcasting of Southwest Oklahoma, Inc. (“Perry Broadcasting”), licensee of KVSP, Anadarko, Oklahoma (Facility ID No. 2189), hereby requests experimental authority to operate with asymmetrical IBOC sidebands pursuant to 47 C.F.R. §§ 5.203 and 73.404 and an Order adopted by the Federal Communications Commission in 2010. *See In the Matter of Digital Audio Broadcasting Systems and their Impact on the Terrestrial Radio Broadcast Service*, Order, 25 FCC Rcd 1182 (2010).

Should any questions arise in relation to this submission, please contact the undersigned.

Respectfully submitted,

Kathleen Victory
Sara L. Hinkle
*Counsel for Perry Broadcasting
of Southwest Oklahoma, Inc.*

Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20002**

In the Matter of)	
)	
PERRY BROADCASTING OF)	File No. _____
SOUTHWEST OKLAHOMA, INC.,)	
)	
KVSP, Anadarko, Oklahoma)	
(Facility ID No. 2189),)	
)	
For an Experimental License to Operate)	
Digitally with Asymmetric Sidebands)	

APPLICATION FOR EXPERIMENTAL SPECIAL TEMPORARY AUTHORITY

Perry Broadcasting of Southwest Oklahoma, Inc. (“Perry Broadcasting”), licensee of KVSP, Anadarko, Oklahoma (Facility ID No. 2189) (“KVSP”), pursuant to Sections 5.203 and 73.404 of the Commission’s rules and the procedures outlined in the Media Bureau’s *Order* in MM Docket No. 99-325, released January 29, 2010,¹ hereby requests experimental authority to operate KVSP via hybrid in-band on-channel (“IBOC”) digital power up to -10 dBc on KVSP’s lower sideband and -14 dBc on its upper sideband. The public interest would be served by grant of the requested experimental authority because KVSP’s experimental operation would allow KVSP to provide HD Radio service to the public, which is a higher quality format than other transmission methods of radio service.

¹ See 47 C.F.R. § 5.203; § 73.404; *In the Matter of Digital Audio Broadcasting Systems and their Impact on the Terrestrial Radio Broadcast Service*, Order, 25 FCC Rcd 1182 (2010) (“DAB Order”).

I. PROPOSED OPERATING PARAMETERS

Specifically, KVSP requests authorization to operate with hybrid digital IBOC at -10 dBc on its lower sideband and -14 dBc on its upper sideband on Channel 278 (103.5 MHz). During the course of the experimental operations, KVSP will remain at its existing transmitter location, and will operate with the existing ERI SPHX-16AC-HW sixteen bay half-wave spaced antenna. The requested power levels are as follows:²

Analog ERP:	100 kW
Digital ERP:	<i>Lower Sideband</i> – 10 kW (-10 dBc/ 10% of analog ERP) <i>Upper Sideband</i> – 4 kW (-14 dBc/ 4% of analog ERP)
Analog TPO:	30.3 kW
Digital TPO:	3 kW
Combined TPO:	33.3 kW (low-level combined)

KVSP will operate with its experimental facilities at all times authorized under its FM license if granted the requested experimental authority.³ KVSP operates with Class C facilities, which conform to the ERP and Height Above Average Terrain (HAAT) requirements of Section 73.211(b) of the Commission's rules.⁴ Accordingly, KVSP is not a "super power" station. Finally, with the exception of the requested operation with asymmetric sidebands, KVSP will operate its experimental facilities in accordance with the technical specifications set forth in Appendix B of the Commission's *First Report and Order* in MM Docket No. 99-325, dated October 11, 2002.⁵

² See Exhibit A attached herein for engineering performed by Anderson Associates.

³ See File No. BLH-20040723AAG.

⁴ 47 C.F.R. § 73.211(b).

⁵ See *Digital Audio Broadcasting Systems and their Impact on the Terrestrial Radio Broadcast Service*, First Report and Order, 17 FCC Rcd 19990, 20015-47, Appx. B (2002).

II. INTERFERENCE

Exhibit A attached hereto discusses interference considerations of KVSP's proposed experimental operations and demonstrates that the proposed operations comply with the Commission's interference standards. Specifically, the engineering statement and contour map included herein as Exhibit A demonstrate that KVSP is able to operate digitally without causing interference to its first-adjacent channel FM stations. Accordingly, by operating asymmetrically at -10 dBc (*i.e.*, 10% of analog ERP) on the lower sideband and -14 dBc (*i.e.*, 4% of analog ERP) on the upper sideband, KVSP will be able to operate in HD without causing interference to the stations identified in Exhibit A.

III. EMERGENCY CONTACT

In the case of any interference complaint received during the course of KVSP's experimental operations, the Commission may contact:

Kevin Perry
Perry Broadcasting of Southwest Oklahoma, Inc.
1528 NE 23rd Street
Oklahoma City, OK 73111
(405) 425-4100
kperry@kvsp.com

IV. SECTION 304 STATEMENT

Perry Broadcasting 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 of the previous use of the same, whether by license or otherwise, and requests and authorization in accordance with this application.⁶

⁶ See 47 U.S.C. § 304.

V. ANTI-DRUG ABUSE CERTIFICATION

Perry Broadcasting certifies that, to its knowledge, neither Perry Broadcasting nor any party to this application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁷

VI. CONCLUSION

For the foregoing reasons, Perry Broadcasting respectfully requests experimental authority operate KVSP's hybrid IBOC digital power up to -10 dBc on KVSP's lower sideband and -14 dBc on its upper sideband.

Respectfully submitted,

**PERRY BROADCASTING OF SOUTHWEST OKLAHOMA,
INC.**

By: 

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Counsel for Perry Broadcasting of Southwest Oklahoma, Inc.

⁷ 21 U.S.C § 862.

EXHIBIT A

Anderson Associates

Broadcast Engineering Consultants

EXPERIMENTL STA APPLICATION

KVSP EXPERIMENTAL AUTHORITY TO OPERATE WITH -10 dBc LOWER SIDE BAND/ -14 dBc UPPER SIDE BAND ASYMETRICAL DIGITAL POWER

Applicant:

Perry Broadcasting of Southwest Oklahoma, Inc
1528 NE 23 rd Street
Oklahoma City, OK 73111
405-425-4100
kperry@kvsp.com

Proposed facility parameters:

KVSP
278C
Anadarko, OK
#2189

N 35-15-03.8
W 98-36-53.8 (corrected to ASR NAD 83 coordinates)

Site elevation = 457.2 meters
Radiation Center AGL = 591 meters
Radiation Center AMSL = 1048 meters

ASR#1239224

100 kW ERP

Purpose:

Request experimental asymmetrical HD power:

HD Upper sideband = 4 kW (4%)
HD Lower sideband = 10 kW (10%)

Anderson Associates

Broadcast Engineering Consultants

Discussion:

KVSP on channel 278C (FCC facility #2189) requests experimental authority to utilize asymmetrical HD power levels in common amplification mode as proposed below:

- (1) Proposed digital power **upper side band = -14 dBc**/ 4% - 4,000 Watts ERP
- (2) Proposed digital power **lower side band = -10 dBc**/ 10% - 10,000 Watts ERP
- (3) Maximum digital TPO = 30.3 kW Analog + 3 kW digital = 33.3 kW TPO

The undersign certifies that the requested digital power level complies with the requirements of MM Docket 99-325. An attached map shows that the KVSP 54.0 dBu (50:10) contour does not overlap the 60 dBu of the closest upper first adjacent channel KYLK and that the 49 dBu (50:10) does not overlap the 60 dBu of the closest lower 1st adjacent channel KESN (see attached contour exhibit).

Therefore, KVSP may run the full 10% or -10 dBc in the lower side band and -14 dBc or 4% in the upper side band.

Proponent Analog F(50,10) Field Strength at Protected Analog 60 dBu F(50,50) Contour	Maximum Permissible FM Digital ERP
51.2 dB μ and above	-14 dBc
50.7 dB μ - 51.1 dB μ	-13 dBc
50.3 dB μ - 50.6 dB μ	-12 dBc
49.6 dB μ - 50.2 dB μ	-11 dBc
49.5 dB μ or less	-10 dBc



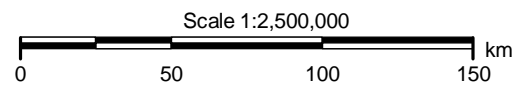
Charles M. Anderson 2-16-2022
cmanderson43@yahoo.com
270-535-4432

KVSP
BLH20040723AAG
Latitude: 35-15-03.80 N
Longitude: 098-36-53.80 W
ERP: 100.00 kW
Channel: 278
Frequency: 103.5 MHz
AMSL Height: 1048.0 m
Elevation: 457.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KYLK
BMLED20110519ACI
Latitude: 35-15-47.30 N
Longitude: 096-22-44 W
ERP: 72.00 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 540.0 m
Elevation: 260.0 m
Horiz. Pattern: Omni

KESN
BLH20121206AEI
Latitude: 33-32-13.90 N
Longitude: 096-49-54.50 W
ERP: 98.00 kW
Channel: 277
Frequency: 103.3 MHz
AMSL Height: 821.0 m
Elevation: 219.0 m
Horiz. Pattern: Omni

FCC 30 meter terrain
data utilized.



KVSP 49 dBu (50:10)

HD Power Permitted:
10% Lower sideband
4% Upper sideband

KVSP 54 dBu (50:10)

KYLK 279C1 - 60 dBu

KESN 277C 60 dBu

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