

# Gray Miller Persh LLP

Attorneys-at-Law  
2233 Wisconsin Avenue NW  
Suite 226  
Washington, DC 20007

Joshua Turiel  
Associate Attorney  
jturiel@graymillerpersh.com  
(202) 516-4235

April 13, 2022

*Submitted via e-mail to [audiofilings@fcc.gov](mailto:audiofilings@fcc.gov)*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554  
ATTN: Media Bureau, Audio Division

Re: Request for Experimental Authority  
NCE Station WUCF-FM, Orlando, FL (Facility ID: 69229)

Dear Ms. Dortch,

On behalf of the University of Central Florida (“UCF”), licensee of noncommercial educational FM radio station WUCF-FM, Orlando, Florida, and pursuant to 47 C.F.R. § 5.203, this letter respectfully requests experimental authority for one year to operate WUCF-FM full time with asymmetrical hybrid digital sideband power to allow testing of hybrid digital FM in-band on-channel (“IBOC”) operation with these parameters. The proposed operations are described in the Engineering STA Request Narrative attached hereto.

UCF respectfully submits that the public interest will be well served by the requested experimental authorization by permitting UCF to obtain additional experience and provide improved service to its local community with IBOC operation including asymmetrical power levels in the digital sidebands.

UCF hereby certifies that neither UCF 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. UCF is a noncommercial educational licensee and operates WUCF-FM on a noncommercial basis. Moreover, UCF qualifies as a governmental entity. The licensee is therefore exempt from FCC filing fee and regulatory fee requirements pursuant to Sections 1.116 and 1.1162 of the Commission’s rules.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,



Joshua Turiel  
Counsel to University of Central Florida

cc: Rodolfo.Bonacci@fcc.gov; Priscilla.Lee@fcc.gov

Enclosures:

Engineering STA Request Narrative

Upper Sideband Contour Map

Lower Sideband Contour Map

WUCF-FM – 89.9 MHz  
Orlando, Florida

Engineering STA Request Narrative

WUCF-FM, facility ID 69229, Orlando, Florida, in filing this engineering STA application, is requesting authorization to increase its digital sideband power in excess of -14dbc.

WUCF-FM currently licensed for 0.36 Kw (H) & 5.6 Kw (V) and operates with a digital component of -20dbc. We propose operation of asymmetrical sideband power of -10dbc upper and -14dbc lower sideband using guidelines set forth in paragraphs 15 through 20 of Order MM Docket Number 99-325. The levels have been determined by the calculation of the WUCF-FM [F 50-10] interfering contour level as it intersects the 60dbu [F 50-50] protected contour of any relevant first adjacent facilities. These determinations are shown in attached exhibits A and B.

The relevant transmitter power output for requested operation are:

Analog carrier power = 3.7 Kw

Lower sideband power = 147.3 watts (-14dbc)

Upper sideband power = 370 watts (-10dbc)

Exhibit A -- Increased upper sideband power above -20 dbC

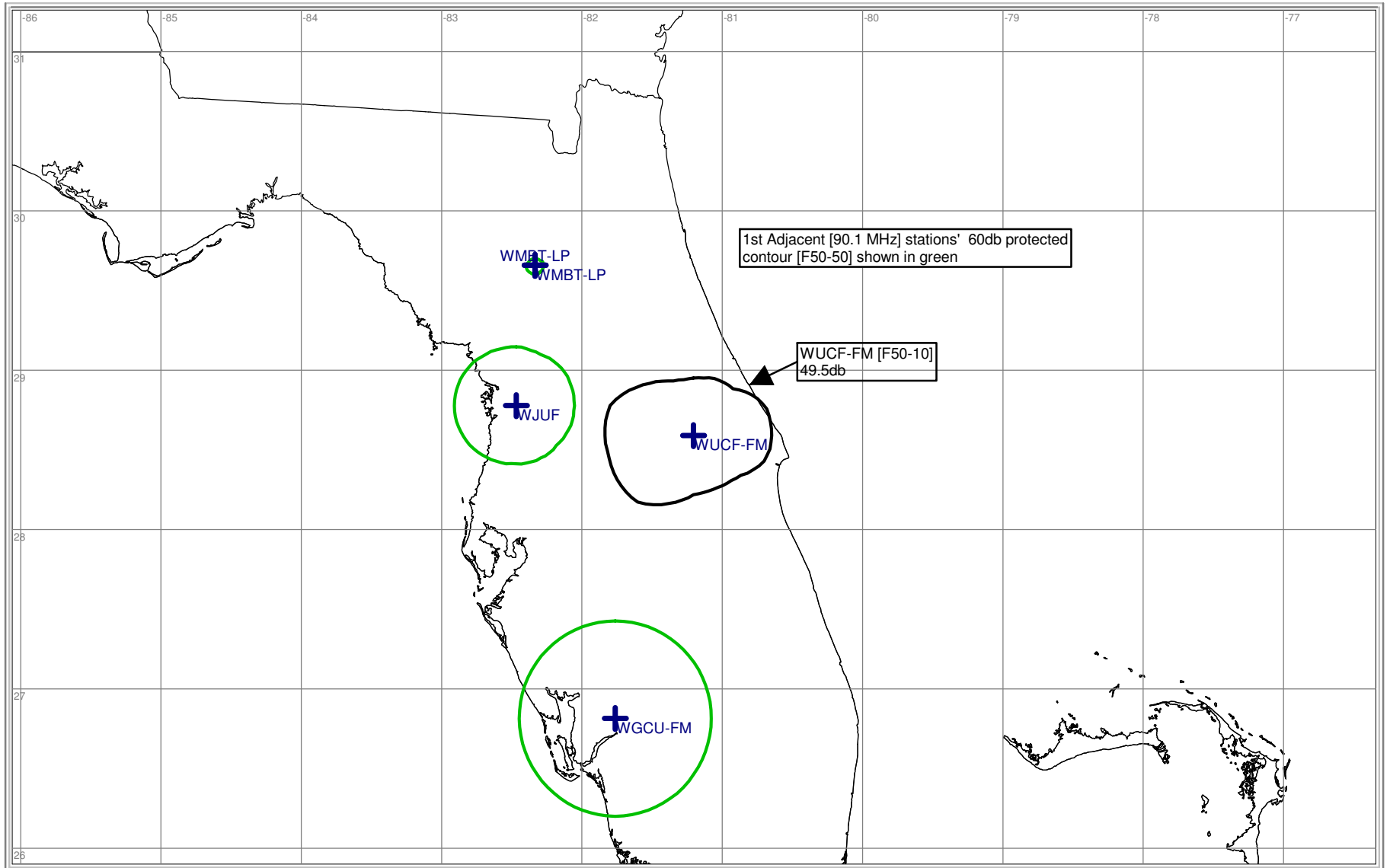


Exhibit B - Lower sideband power increase above 20 dbC

