The Law Office of

Dan J. Alpert

2120 N. 21st Rd. Arlington, VA 22201 **DJA@COMMLAW.TV**

(703) 243-8690 (703) 243-8692 (FAX)

August 10, 2022

Ms. Marlene Dortch Secretary Federal Communications Commission 45 L St., N.E. Washington, DC 20554

Re: Station WYCT(FM)
Pensacola, FL
Facility No. 539

Dear Ms. Dortch:

The Mary Elizabeth Hoxeng Revocable Trust hereby requests issuance of new Experimental Authorization for testing of hybrid digital FM in band, on-channel ("IBOC") operation with asymmetric power levels in the digital sidebands. An engineering report showing the parameters under which the Experimental Authorization will operate is attached.

The current licensee's predecessor, ADX Communications of Pensacola, was granted an Experimental Authorization utilizing these parameters previously. File No. 20170905AAO. WYCT has operated in asymmetrical mode with good HD reception since grant of the Experimental Authorization with no reported adverse impacts on either first adjacent channel stations. Therefore, grant of this request will be in the public interest.

The engineering showing associated with this request in the past is attached. The Shively 6810-8/3IAD-DA used previously was installed with 8 analog bays and had 3 interspersed digital bays for HD Radio. The 3 digital bays have been removed so the Station now only utilizes its Shively 6810-8 DA Antenna, which consists of the same 8 analog directional bays, but they are now being used in conjunction with a HD signal that is generated in the transmitter, with the end result being analog + HD Digital.

If there are any questions, please contact this office.

Very truly yours,

/Dan J. Alpert/

Dan J. Alpert

Counsel for The Mary Elizabeth Hoxeng Revocable Trust

WYCT DIGITAL POWER REQUEST

August 24, 2017

WYCT requests asymmetrical digital power greater than -14 dBc using an Engineering STA application in accordance with Commission policy. Requested parameters using the licensed Shively 6810-8/3IAD-DA antenna are:

- 1. Analog ERP = 100 kW TPO = 17 kW (licensed value)
- 2. Digital ERP = 10 kW (max) TPO = 1.7 kW max.
- 3. Total TPO = 18.7 kW using low level combined (single transmitter and antenna).

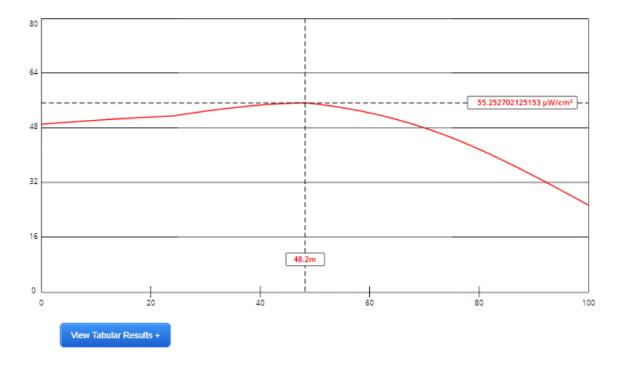
Upper sideband ERP = -10 dBc = 10 kW (see attached exhibit)

Lower sideband ERP = -13 dBc = 5.01 kW (see attached exhibit).

Technical contact = Briton Smith - 850-262-6000.

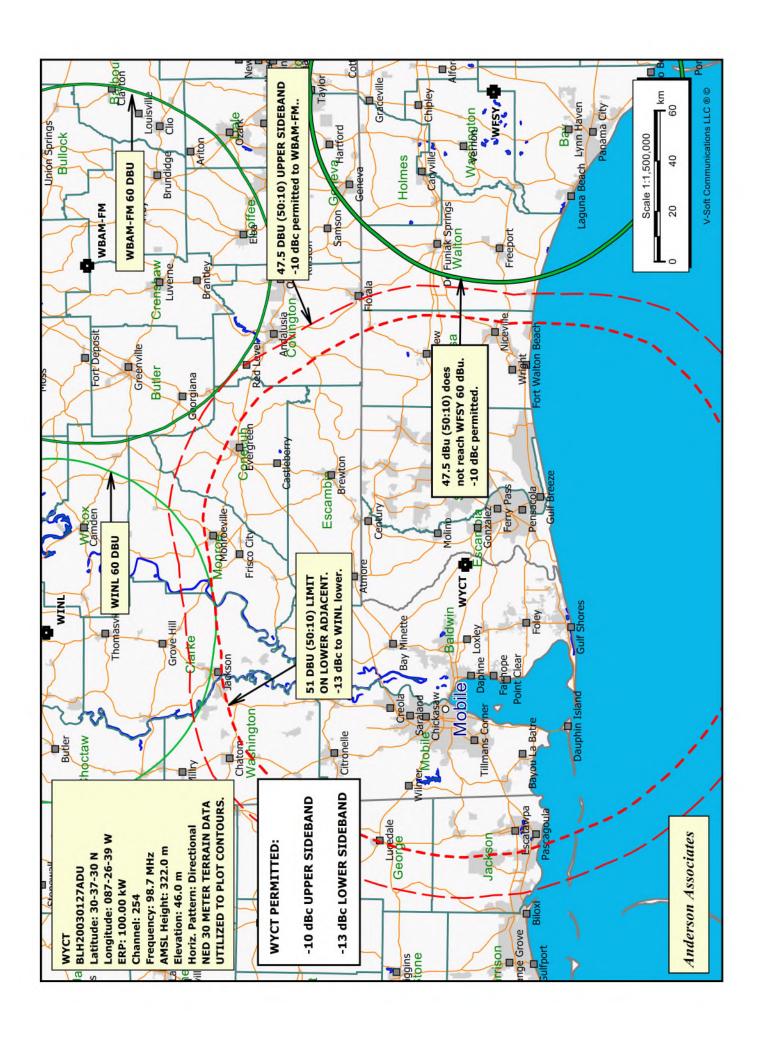
- 4. The proposed operation is in full compliance with the Ibiquity standards.
- 5. The proposed operation complies with FCC radiation requirements based on a calculation using the Commission's FMMODEL program.

 Based on 110 kW maximum the is calculated to be 55.3 *u*Watts/cm² or 27.6% of the maximum general population exposure limit.
- 6. Digital operation will commence upon Commision approval.



Channel Selection	Channel 250 (97.9	[Channel 250 (97.9 MHz) ▼ [EPA Type 1: Ring-and-Stub or "Other" ▼							
Antenna Type +	EPA Type 1: Ring-a								
Height (m)	276	Distance (m)	100						
ERP-H (W)	110000	ERP-V (W)	110000						
Num of Elements	8	Element Spacing (λ)	1						
Num of Points	500		Apply						

Charles M. Anderson





United States of America

FEDERAL COMMUNICATIONS COMMISSION FM BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

ADX COMMUNICATIONS OF PENSACOLA 7251 PLANTATION RD.
PENSACOLA FL 32504

Facility Id: 539 Call Sign: WYCT

License File Number: BLH-20030127ADU

This License Covers Permit No.: BPH-198803240J, as modified by BMPH-20020318AAY

Rodolfo F. Bonacci Supervisory Engineer Audio Division Media Bureau

Grant Date: January 31, 2003

This license expires 3:00 a.m. local time, February 01, 2004.

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Callsign: WYCT License No.: BLH-20030127ADU

Name of Licensee: ADX COMMUNICATIONS OF PENSACOLA

Station Location: FL-PENSACOLA

Frequency (MHz): 98.7

Channel: 254

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: 17.0 kW

Antenna type: Directional

Description: SHI 6810-8/3IAD-DA

Antenna Coordinates: North Latitude: 30 deg 37 min 30 sec

West Longitude: 87 deg 26 min 39 sec

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW):	100	100
Height of radiation center above ground (Meters):	276	276
Height of radiation center above mean sea level (Meters):	322	322
Height of radiation center above average terrain (Meters)	: 299	299

Antenna structure registration number: 1235802

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

Special operating conditions or restrictions:

1	*****	This	is	а	Section	73.215	contou	ır protecti	ion	grant	******
	*****	****	***	* *	as reque	ested by	y this	applicant	***	*****	*****

The permittee/licensee must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

Special operating conditions or restrictions:

3 The relative field strength of neither the measured horizontally nor vertically polarized radiation component shall exceed at any azimuth the value indicated on the composite radiation pattern authorized by this construction permit.

A relative field strength of 1.0 on the composite radiation pattern herein authorized corresponds to the following effective radiated power:

100 kilowatts.

Principal minima and their associated field strength limits:

90 degrees True: 30.25 kilowatts 350 degrees True: 38.44 kilowatts

*** END OF AUTHORIZATION ***