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Direct Phone: 202.298.2527 melodie.virtue@foster.com

September 22, 2022

VIA EMAIL DELIVERY: Rodolfo.Bonacci@fcc.gov

Mr. Rodolfo F. Bonacci Assistant Division Chief Audio Division, Media Bureau Federal Communications Commission

Re: Broadcast Station KQHR(FM), The Dalles, OR, Facility ID No. 175508

All Classical Public Media, Inc., FRN # 0005853098

Request for Extension of Experimental Authority to Operate with

Asymmetrical Hybrid Digital Sideband Power in File No. 20210917AAJ

Dear Mr. Bonacci:

On behalf of All Classical Public Media, Inc., licensee of noncommercial educational FM radio station KQHR(FM), The Dalles, Oregon, pursuant to FCC Rule 5.203, this letter is written to request an extension of its experimental authority for one year to operate KQHR(FM) full-time with asymmetrical hybrid digital sideband power. The most recent authorization was granted by letter dated October 22, 2021, from Rodolfo F. Bonacci in the Audio Division of the Media Bureau ("Initial Experimental Authorization"). A copy of the Experimental Authorization is attached along with the report from KQHR(FM) Engineering Consultant, David J. Doherty, detailing the methodology employed and the results obtained.

Also enclosed is the Anti-Drug Abuse Certification of the licensee. No filing fee is required for this type of request.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Melodie A. Virtue

Its Attorney

MAV:cll Enclosures

cc: James D. Bradshaw (pdf copy via email James.Bradshaw@fcc.gov)

FG: 100597777.1

SEATTLE PORTLAND WASHINGTON, D.C. NEW YORK SPOKANE BEIJING

ANTI -DRUG ABUSE CERTIFICATION

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862a, or, in the case of a non-individual applicant (e.g. corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. §1.2002(b).

	[X] Yes [] No
Name of Applicant:	Suzanne Nance
Signature:	Same hance
Title:	President & CEO
Date:	9/22/2022

All Classical

All Classical Public Media, Inc. 211 SE Caruthers Street Portland, OR 97214

September 21, 2022

Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, DC 20554

RE: Renewal of Experimental Request 20210917AAJ for KQHR, FCC Facility ID # 175508, The Dalles, OR.

This report is provided to support the request to continue the captioned KQHR Experimental Authorization, which authorizes operation at -10 dBc on the lower IBOC digital sideband and -12 dBc on the upper.

The author has had personal experience with the station for more than four years, having served as consultant throughout that time, and acting Chief Operator from time to time as required.

I have personally observed that the digital signal as authorized is significantly more reliable than the analog signal along Interstate 84 and US Route 14 from east of Cascade Locks to east of The Dalles; in the communities of Lyle, Bingen and White Salmon in Washington; and in Hood River and The Dalles in Oregon. (The Dalles is the Principal Community for KQHR.) These observations were taken in many different vehicles over a time span of more than four years.

KQHR has now amassed well over 40,000 hours of operation in asymmetrical hybrid mode. Not a single complaint of interference has been lodged with the licensee. All Classical Public Media continues to monitor the operation to ensure that it remains within the authorized parameters.

Thank you,

David J. Doherty
Technical Consultant



Federal Communications Commission Washington, D.C. 20554

October 22, 2021

MEDIA BUREAU AUDIO DIVISION APPLICATION STATUS: (202) 418-2730 HOME PAGE: www.fcc.gov/media/radio/audio-division PROCESSING ENGINEER: Priscilla M. Lee TELEPHONE: (202) 418-2957 GROUP FACSIMILE: (202) 418-1411 INTERNET ADDRESS: Priscilla.Lee@fcc.gov

Melodie A. Virtue, Esq. Garvey Schubert Barer 1000 Potomac Street, NW Suite 200 Washington, DC 20007-3501

> Re: KQHR(FM), The Dalles, Oregon All Classical Public Media, Inc. Facility ID No. 175508 File No. 20210917AAJ

> > **Request for Experimental Authority**

Dear Counsel:

The staff has under consideration the September 17, 2021, request for experimental authority submitted on behalf of All Classical Public Media, Inc. (ACPMI), licensee of noncommercial educational FM Station KQHR(FM), The Dalles, Oregon, to permit KQHR(FM) to conduct testing of hybrid digital FM in-band on-channel (IBOC) operation with asymmetric power levels in the digital sidebands. The experimental authority is requested pursuant to Section 5.203 of the Commission's Rules.²

The request states that ACPMI is seeking experimental authority to operate KQHR(FM) with lower sideband (LSB) digital effective radiated power (ERP) of -10 dBc³ and upper sideband (USB) digital ERP of -12 dBc. In support of its request, ACPMI submitted an engineering study showing that the proposed operation complies fully with the contour nonoverlap requirements of the Media Bureau's *Order* adopted January 27, 2010, in MM Docket No. 99-325⁴ for operation with -10 dBc LSB digital ERP and -12 dBc USB digital ERP.

¹ File Number BLED-20120315ADV. KQHR(FM) is licensed to operate on channel 201 (88.1 Megahertz) using a directional antenna, 4 kilowatts (kW) maximum effective radiated power (ERP), and 340 meters antenna radiation center height above average terrain at a transmitter site described by geographic coordinates 45° 43' 19" North Latitude, and 121° 26' 14" West Longitude, referenced to 1927 North American Datum.

² 47 CFR § 5.203 (Section 5.203).

³ Decibels relative to analog carrier.

⁴ Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service, MM Docket No. 99-325, Order, 25 FCC Rcd 1182 (MB 2010) (Order).

Our review indicates that the proposed KQHR(FM) digital operation complies with the contour nonoverlap and other technical requirements of the Order, and the request for experimental authority meets the requirements for experimental operations set forth in Section 5.203. Accordingly, the request is HEREBY GRANTED. KQHR(FM) may operate with increased digital ERP as follows:

Analog ERP: 4.0 kilowatts (kW), H&V⁵

Digital LSB ERP: 6 0.200 kW Digital USB ERP: 0.125 kW.

This experimental authority expires on **October 22, 2022**. This authority is specifically conditioned on the lack of objectionable interference. A report detailing the methodology employed and the results obtained must be submitted within 90 days following the conclusion of the experimental operation. Any request for extension of this experimental authority should be filed at least 30 days prior to the expiration date of the authority. Additionally, an extension request must include an interim version of the aforementioned report that details the progress of the experimental operation as of the filing date of the request.

Sincerely,

Rodolfo F. Bonacci Assistant Division Chief Audio Division Media Bureau

cc: All Classical Public Media, Inc.

⁵ All ERP values rounded in accordance with 47 CFR § 73.212(a).

⁶ Digital ERP values shown are for MP1 service mode. The licensee must adjust the station's asymmetric total digital sideband ERP values in accordance with NRSC guideline "NRSC-G202-A, FM IBOC Total Digital Sideband Power for Various Configurations" (April 2016) if operating using a service mode other than MP1.