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February 14, 2023

*Submitted via e-mail to audiofilings@fcc.gov*

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

Re: Request for Extension of Experimental Authority to Operate with Asymmetrical Hybrid Digital Sideband Power
WGCU-FM, Fort Myers, Florida, Facility ID No. 69042

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 existing experimental authority for one year, up to and including March 26, 2024. 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 extension of experimental authorization by permitting FGCU to continue to obtain 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 educational 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 1.1116 and 1.1162 of the Commission's rules. Please don't hesitate to contact me with any questions regarding this matter.

Sincerely,

Joshua Turiel

Joshua Turiel
Counsel to Florida Gulf Coast University Board of Trustees

cc: Priscilla M. Lee, Priscilla.Lee@fcc.gov
Rodolfo Bonacci, Rodolfo.Bonacci@fcc.gov

REPORT ON IMPLEMENTATION OF ASYMMETRICAL
SIDEBAND INJECTION IN HYBRID FM IBOC SYSTEM

FM BROADCAST STATION WGCU-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 WGCU-FM, Fort Myers, Florida (Facility ID No. 69042).

2. WGCU-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.[*] WGCU-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 WGCU-FM, which has now been in operation for nearly three years, 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, WGCU-FM continues 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, WGCU-FM is able to provide a third audio channel (HD3) that is employed for long form news and special events as needed. In

[*] See FCC File No. BMLED-19990823KA.
[†] WGCU-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.
[‡] WGCU-FM first received experimental authority for its asymmetrical IBOC operation in March 2019.

view of the ongoing success of the operation, WGCU-FM would like to continue its service and observations of the asymmetrical sideband IBOC system to facilitate potentially greater implementation for the industry in the future.

Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
5212 Station Way
Sarasota, FL 34233

January 30, 2023