GRAY MILLER PERSH LLP
2233 Wisconsin Ave., NW, Suite 226
Washington, DC 20007

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

April 6, 2023

Submitted via e-mail to 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 Extension of Experimental Authority to Operate with Asymmetrical Hybrid Digital Sideband Power
NCE Station WUCF-FM, Orlando, FL (Facility ID: 69229)

Dear Ms. Dortch,

On behalf of the University of Central Florida Board of Trustees ("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 extension of the station's existing experimental authority for one year, up to and including May 11, 2024.[1] This would allow WUCF-FM to continue to operate full-time with asymmetrical hybrid digital sideband power to allow testing of hybrid digital FM in-band on-channel ("IBOC") operation with these parameters. UCF submits that the public interest will be well served by the requested extension of experimental authority by permitting UCF 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.

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.

Please don't hesitate to contact me with questions regarding this matter.

Sincerely,

Joshua Turiel

Joshua Turiel
Counsel to University of Central Florida Board of Trustees

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

[1] Experimental authority was granted on May 11, 2022, in File Number 20220413AAD.

TECHNICAL STATEMENT OF JEFFREY C. GEHMAN OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS IN SUPPORT OF THE FILING BY UNIVERSITY OF CENTRAL FLORIDA BOARD OF TRUSTEES REGARDING THE EXTENSION OF THE EXPERIMENTAL AUTHORIZATION TO OPERATE ITS STATION WUCF-FM (FACILITY ID 69229) CHANNEL 210C3 (89.9 MHz) WITH ASYMMETRICAL IBOC HD RADIO SIDEBANDS

This Technical Statement has been prepared in support of the filing by University of Central Florida Board of Trustees ("UCFBT") to extend its experimental authorization to operate asymmetrical FM HD sidebands at its Channel 210C3 (89.9 MHz) Orlando, FL station, WUCF-FM (facility ID 69229).

WUCF-FM is licensed for analog FM operation on Channel 210C3 (89.9 MHz) with a directional transmitting antenna system producing an effective radiated power of 5.6 kW vertical (at 486 feet HAAT) / 0.36 kW horizontal (at 476 feet HAAT) with -14 dB symmetrical FM IBOC HD Radio sidebands, and has been operating with an experimental authorization to transmit asymmetrical sidebands of -14 dB lower sideband (LSB) and -10 dB upper sideband (USB) since 2017 (see attached).

The implementation of IBOC HD Radio allows UCFBT to not only broadcast in high fidelity HD the same programming it broadcasts on its analog FM channel, but also allows broadcast of its Latin Jazz programming in high fidelity on its HD2 subchannel, which would otherwise not be possible.

Field campaigns have demonstrated that experimental operation of WUCF-FM's higher powered -10 dB USB has consistently resulted in a significant and desirable reception improvement which more closely replicates WUCF-FM's analog reception. And since UCFBT has received no complaints from listeners, neighboring stations, or others, it is believed that extension of the experimental authorization is a public benefit and is therefore justified.

This technical statement has been prepared by Jeffrey C. Gehman who is an associate of Kessler and Gehman Associates, Inc. with offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1986. He states under penalty of perjury that the information contained in this statement is true and correct to the best of his knowledge and belief.

KESSLER AND GEHMAN ASSOCIATES, INC.

Jeffrey C. Gehman
Engineering Associate

April 5, 2023