



20100830ACP

August 16, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Experimental Operation of Conditional Access
WXXI Public Broadcasting Counsel
WXXI(FM), Rochester NY
Facility ID No. 74218

Dear Ms. Dortch:

The WXXI Public Broadcasting Counsel hereby requests experimental authority for noncommercial educational radio station WXXI (FM) to conduct tests of the HD Radio system using conditional access transmission on the HD-3 multicast channel. The experimental authority is requested pursuant to 47 C.F.R. § 73.1510 for a period of three months.

The requested operation with conditional access HD Radio is to be conducted in conjunction with National Public Radio (NPR) as part of a study of the system for radio reading services for the blind and physically handicapped. Programming will be supplied by Reachout Radio, of Rochester NY, which currently provides radio reading service programming via SCA subcarrier on WXXI. The planned tests will evaluate the usability of new conditional access receivers by users, the sound quality and signal coverage capabilities. A copy of the report, detailing test procedures and technical findings, will be provided to the Commission at the conclusion of experimental operation.

All testing will be conducted on WXXI's regular transmitter system. Because the HD-3 emission is added on digital subcarriers closer to center of the FM channel, and because the spectral power density will not be increased relative to the present primary main digital subcarriers, it is expected there will be no effect to interference potential of other stations. However, all testing will be conducted on a non-interference basis and in compliance with the NRSC-5-B Standard. Technical questions may be directed to Kent Hatfield, telephone 585-258-0228, email khatfield@wxxi.org.

The Commission's Public Notice DA-05-609 specifies that no filing fee is required to accompany this request; and in any event, WXXI is exempt from filing fees because it is a noncommercial educational licensee.

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Anti-drug abuse certification: The applicant certifies that to the knowledge of WXXI, no party to this request, as defined in 47 C.F.R. Section 1.2002(b), is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Sec 862.

Sincerely,



Kent S. Hatfield
Vice President, WXXI Public Broadcasting Council

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