

ORIGINAL



WASHINGTON, DC

June 18, 2013

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Via Hand Delivery

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

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JUN 18 2013

Federal Communications Commission
Office of the Secretary

**Re: Application for Experimental Authorization
Station WNCT(AM), Fac. ID No. 57841, Greenville, NC**

Dear Ms. Dortch:

Transmitted herewith, on behalf of WNCT License Limited Partnership, licensee of station WNCT(AM), Fac. ID No. 57841, Greenville, NC, is a request for Experimental Authority to conduct testing of the AM all digital transmission mode.

Details of the test program and its parameters are set forth in the attached letter.

Please date-stamp the enclosed "Return Copy" of this request and return it to the courier delivering the package.

Should there be any questions concerning this matter, please contact the undersigned. Technical questions should be directed to Mike Cooney at 239-659-7326 or mike.cooney@bbgi.com.

Respectfully submitted,

Laura M. Berman
Counsel to WNCT License Limited Partnership

Enclosure

cc: Susan Crawford (via email)
David Layer (via email)
Mike Cooney (via email)

June 18, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554
Attn: Media Bureau, Audio Services

Dear Ms. Dortch:

WNCT Licensed Limited Partnership, licensee of AM broadcast station WNCT(AM), Greenville, North Carolina, in accordance with Section 73.1510 of the FCC's Rules, hereby requests experimental authority to conduct testing of the AM all digital transmission mode as defined in the iBiquity HD Radio™ AM Transmission System Specifications, Rev. F, August 24, 2011. This request is consistent with the FCC's prior statement that broadcasters "are encouraged to experiment with an all-digital service, with appropriate authorization." Digital Audio Broadcasting Systems, Second Report and Order, 22 FCC Rcd 10344, 10353 (2007).

The testing will be conducted in conjunction with the National Association of Broadcasters using WNCT's antenna and transmission facilities. It is believed that this testing will be of significant value to the broadcast industry as it works to improve the delivery of AM broadcasts in the presence of an ever increasing noise floor.

WNCT is a class B AM station currently operating on 1070 kHz pursuant to an STA with a directional antenna and a power output of 30 kW day and 10 kW night. Tower information is included herein in Table 1 (daytime) and Table 2 (nighttime). No modifications will be made to the antenna system nor the BE 4MX-50 transmitter that is currently used to transmit iBiquity's modified MA-1 hybrid IBOC transmission system.

Table 1. Tower information (daytime)

Tower No.	Field Ratio	Phase (deg)	Spacing (deg)	Orientation (degrees)	Electrical Height (deg)	Antenna Structure Registration Number
1	0.129	99.80	0.00	0.00	74.40	1246838
2	0.692	140.80	234.50	20.20	74.40	1246840
3	1.000	0.00	205.00	36.30	74.40	1246841
5	0.110	-8.80	111.60	7.40	74.40	1246843

Table 2. Tower information (nighttime)

Tower No.	Field Ratio	Phase (deg)	Spacing (deg)	Orientation (degrees)	Electrical Height (deg)	Antenna Structure Registration Number
1	0.796	134.20	0.00	0.00	74.40	1246838
2	0.886	123.30	234.50	20.20	74.40	1246840
3	1.000	0.00	205.00	36.30	74.40	1246841
4	0.892	6.30	55.00	119.30	74.40	1246842
5	0.317	131.00	111.60	7.40	74.40	1246843

The proposed all-digital mode will essentially replace the analog modulation by moving the primary IBOC carriers currently located in the hybrid mode in the region +/- 10 kHz to +/- 15 kHz to the region the center +/- 5 kHz of the channel. The secondary carriers are located in the region +/- 5 to +/- 10kHz. The secondary carriers are set to the same level as the primary carriers in the hybrid mode. The total bandwidth of the all-digital mode is +/- 10 kHz vs. +/- 15 kHz in the hybrid mode.

The transmitter will be operated at the highest level possible without exceeding either the RMS 30 kW authorized day power or the 10 kW authorized night power and the out-of-band emissions as specified in HD Radio™ AM Transmission System Specifications, Rev. F, August 24, 2011, section 4.5.4 Spectral Emissions Limits for All Digital Transmissions, Table 4-4: HD Radio AM All Digital Waveform Spectral Emissions Limits.

The proposed experimental operation will not affect WNCT's RF emissions and the station's most recent RF emissions analysis remains accurate.

WNCT Licensed Limited Partnership and its parent company, Beasley Broadcast Group, Inc., are committed to continuing to serve their listeners with the highest quality AM service possible and therefore respectfully requests that the experimental authority requested herein be granted for a period of 90 days, commencing July 1, 2013. BIA Research, Inc.'s Media Access Pro Radio Analyzer database reflects that there are 58 full power AM and FM stations in the Greenville-New Bern-Jacksonville, NC radio market, six of which are controlled by Beasley Broadcast Group, Inc.

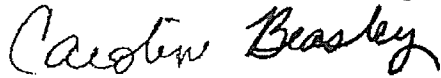
Technical questions regarding this request may be directed to Mr. Mike Cooney, telephone 239-659-7326, e-mail mike.cooney@bbgi.com. This request does not affect the station's official mail address, which remains 3033 Rivera Drive, Suite 200, Naples, FL 34103.

I hereby certify that the statements made in this application are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I further

Marlene H. Dortch, Secretary
June 18, 2013

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certify that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.



Caroline Beasley
Secretary of Beasley FM Acquisition Corp.,
General Partner of WNCT Licensed Limited Partnership

cc: Susan Crawford, Audio Division
(via email susan.crawford@fcc.gov)
David Layer, NAB
(via email dlayer@nab.org)