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

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Federal Communications Commission  
Office of the Secretary

Request for Experimental Authority  
Radio License Holding CBC, LLC  
Station KTUC (AM), Tucson, AZ  
FCC Facility ID #35684

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Dear Ms. Dortch:

Radio License Holding CBC, LLC, licensee of AM Station KTUC, Tucson, Arizona, in accordance with Section 5.203 of the Rules, hereby requests experimental authority to conduct testing of all-digital AM transmission in cooperation with the National Association of Broadcaster's NAB Labs utilizing the antenna facilities of KTUC. The proposed testing at KTUC will be the fourth such instance of all-digital AM testing coordinated by NAB Labs and the first on a class C AM station. It is believed that the results of such testing will be of significant value to the broadcast industry in as much as a possible eventual and universal transition to all-digital AM transmission on the part of AM stations could quite conceivably provide a solution to many of the numerous technical challenges currently plaguing the service.

KTUC is a class C AM station operating on 1400 kHz with daytime and nighttime facilities of 1 kW utilizing a nondirectional antenna. All-digital testing is proposed utilizing both the daytime and nighttime facilities of KTUC. The tentative test dates are February 17 through 21, 2014.

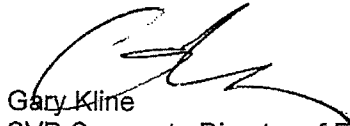
The proposed all-digital mode of operation, as defined in the NRSC's NRSC-5-B IBOC Digital Radio Broadcasting Standard, effectively replaces the usual analogue modulation components between the carrier and +/- 10 kHz from the carrier, with multiple digital subcarriers. The amplitude of such subcarriers does not exceed the limits specified in Section 73.44 and all components of the proposed digital transmission likewise are compliant with 73.44. KTUC has arranged for technical representatives of Harris, the manufacturer of the IBOC digital radio exciter, to visit the transmitter site prior to the proposed testing dates and confirm proper adjustment of the exciter to assure optimum all-digital transmission and compliance with FCC rules as to occupied bandwidth and spurious emissions.

A measurement program consisting of mobile measurements to allow continuous data collection and to identify the point of digital signal failure on a number of radials (ideally 8) will be conducted during periods of all-digital operation. This is similar to the measurements made during previous AM all-digital tests on WBCN, WNCT, and WBT.

To allow for the possibility of unanticipated technical issues or the necessity to conduct additional follow up testing, Radio License Holding CBC, LLC requests that the experimental authority be granted for a period of 90 days. Any questions as to this request or any other aspect of the proposed testing may be addressed to the undersigned.

I hereby certify that the statements made in this application are true and complete to the best of my knowledge and belief. I further 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 U.S.C. 862.

Very truly yours,



Gary Kline  
SVP Corporate Director of Engineering & IT  
Cumulus Radio

cc: Ms. Susan Crawford, Assistant Chief, Audio Division (via email)  
Mr. David Layer, NAB (via email)  
Mr. Mark Simpson, Technical Manager, KTUC Radio (via email)