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AUDIO SERVICE

March 6, 2014

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

> > Request for Extension of Experimental Authority WBT(AM), Charlotte, NC FCC Facility ID #30830 File No. 20130723AEF

Dear Ms. Dortch:

Greater Media Charlotte, licensee of AM broadcast station WBT, Charlotte North Carolina, in accordance with section 5.203 of the Rules, hereby requests an extension of the experimental authority, originally granted on July 31, 2013 in a letter from Ms. Susan Crawford Assistant Chief of the Commission's Audio Division, to conduct further testing of all digital AM transmission in cooperation with the National Association of Broadcaster's Science and technology department's NAB Labs utilizing the daytime and nighttime antenna facilities of WBT. The continued testing at WBT is the third such instance of all digital testing coordinated by NAB Labs and the first on a class A AM station. It is felt that the results of such testing will be of significant value to the broadcast industry in as much as the 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.

WBT is a class A AM station operating on 1110 KHz with daytime facilities of 50KW utilizing a nondirectional antenna and nighttime facilities of 50 KW utilizing a directional antenna. All digital testing is proposed utilizing both the normal daytime and nighttime facilities of WBT between the hours of approximately 1AM and 5 AM. The request to perform nondirectional testing is new to this request for extension of the Experimental Authority and is proposed after a preliminary analysis of the first round of testing suggested that documentation of this mode of operation could prove valuable in the further investigation of the all digital mode of transmission.

The proposed all digital mode of operation, as defined in the NRSC-5-C standard, effectively replaces the usual analogue modulation components between the carrier and +/- 10 KHz from the carrier, with multiple digital carriers. The amplitude of such carriers does not exceed the limits specified in section 73.44 and all components of the proposed digital transmission likewise are compliant with 73.44. WBT has arranged for technical representatives of Harris, the manufacturer of the WBT alternate main 3DX-50 transmitter, to visit the transmitter site prior to the proposed testing dates and confirm proper adjustment of the transmitter to assure optimum all digital transmission and compliance with FCC rules as to occupied bandwidth and spurious emissions. The waveforms observed during the initial testing showed excellent compliance with the NRSC-5-C standard "mask" for operation in the MA-3 all digital mode.

A continuation of the measurement program consisting of mobile measurement 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 two previous AM all digital tests at WBCN and WNCT. Several anomalies noted with receiver performance will be further investigated and a better understanding of the proper setting of the so called "blend bit" in the HD Radio exporter will enable this parameters to the optimally set for the continued testing.

A 90 day extension to the original experimental authority was granted by the Commission on November 12, 2014 by email from Mr. James Bradshaw of the Commission's Audio Division. Due to logistical issues involving NAB's all digital testing efforts at other stations and WBT programming scheduling, no all digital testing was carried out during the 90 day term of this extension. The second round of testing at WBT is now scheduled for March 21 and 22nd. To allow for the possibility of unanticipated technical issues or the necessity to conduct additional follow up testing, Greater Media Charlotte requests that the experimental authority be extended for an additional period of 90 days. Any questions as to this request or any other aspects of the proposed testing may be addressed to the undersigned. A report of the results of all digital testing at WBT will be submitted to the Commission at the conclusion of the additional testing proposed herein.

I hereby certify that the statement 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,

Milford K. Smith, Jr.

cc: Mr. James Bradshaw , Audio Division (via email)

Mr. David Layer, NAB

Mr. Jerry Dowd, Technical Manager, WBT Radio

Ms. Ellen Rubin, Esq., Greater Media, Inc.