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December 7, 2017

**VIA HAND DELIVERY**

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

**ACCEPTED/FILED**

DEC - 7 2017

Federal Communications Commission  
Office of the Secretary

Re: **Station WSFS(FM), Miramar, FL, Facility ID No. 29567  
File No. 20170105AHD  
Interim Report on IBOC Asymmetrical Sideband Operation  
and Request for Extension of Experimental Authority**

Dear Ms. Dortch:

On January 12, 2017, via a letter from Ms. Susan Crawford of the Commission's Audio Division and pursuant to a previous request by Entercom Miami License, LLC ("Entercom"), licensee of WSFS(FM), Miramar, Florida (Facility ID No. 29567) (the "Station"), experimental authority was granted to operate the Station with asymmetrical IBOC sidebands. Specifically, Entercom was authorized to operate the Station with a digital power of -10 dBc on its lower sideband and -14 dBc on its upper sideband. The Station operation previous to asymmetrical operation under the EA was at -14 dBc, symmetrical.

Asymmetrical operation by the Station was initiated on March 26, 2016 and has been continuous up to and including the date of this letter. There have been no complaints of interference from any party during the twenty months of operation in this mode. The transmission system, consisting of a Gates Air Model FAX60HD consisting of two FAX30HD combined transmitters, has experienced no issues. The main antenna is an ERI Axiom 12 bay, half wave spaced with a non-directional horizontal plane radiation pattern. The antenna is fed from a six station ERI constant impedance system. The Station filter is an eight section unit.

Entercom Market Chief Engineer Gary Blau notes that coverage was significantly improved when going from -20 dBc to -14 dBc but that the improved coverage with the asymmetrical -10 dBc operation is difficult to gauge in the Miami market. This is partly due to the



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size of the Class C1 coverage area and the flat terrain in the Miami market and partly due to his presence in the core market with little time at the HD fringe where the additional signal is expected to help listeners. The other factor is the current lack of HD table top and portable listening devices which would benefit from the greater power for in urban listening environments. It is expected that the importance of maximizing HD power will grow as the HD receiver base grows and a greater number of listeners begin to expect to see more than one program stream being broadcast by FM stations. This parallels ATSC TV viewership where comparatively few people watch the over the air signal and are aware that many of today's DTV stations broadcast multiple programs.

Entercom appreciates the continued grant of experimental authority believing that the greatest current value is to gather filed data regarding interference and to hopefully use that data to support transitioning full HD power asymmetrical operation to normal rather than experimental authority. Based on the information herein it is requested that the current experimental authority for the Station be further extended for an additional year.

If any information is desired in connection with this matter, please feel free to contact me. Kindly date stamp the enclosed copy of this letter acknowledging its receipt by your office and return it to the courier delivering this package.

Respectfully submitted

A handwritten signature in blue ink, appearing to read 'LMB', followed by a long horizontal line extending to the right.

Laura M. Berman  
*Counsel to Entercom Miami License, LLC*

cc: Susan Crawford, Audio Division