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2018 DEC 17 PM 2:24

Received & Forwarded

DEC 14 2018

FCC Mail Room

December 13, 2018

**Via OVERNIGHT DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9050 Junction Drive  
Annapolis Junction, MD 20701

**RE: WSFS(FM), Miramar, Florida (Facility ID No. 29567)  
File No. 20171207ACL  
Interim Report on IBOC Asymmetrical Sideband Operation  
and Request for Extension of Experimental Authority**

Dear Ms. Dortch:

On January 11, 2018, via a letter from Ms. Susan Crawford of the Commission's Audio Division and pursuant to a request by Entercom Miami License, LLC ("Entercom Miami"), then licensee of WSFS(FM), Miramar, Florida (Facility ID No. 29567) (the "Station"), experimental authority (EA) was granted to the Station to operate with asymmetrical IBOC sidebands.<sup>1</sup> Specifically, the Station was authorized to operate with a digital power of -10 dBc on its lower sideband and -14 dBc on its upper sideband. 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 while the Station has been 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's Director of Engineering in the Miami market has spent time in the past year driving the Station's signal out past its protected contour. During these drives, he noted that the in-car HD coverage at the present elevated LSB power level seems to be more comparable to the

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<sup>1</sup> On November 13, 2018, Entercom Miami assigned the license for the Station to Entercom License, LLC ("Entercom"). See FCC File No. BALH-20181022AKI.

analog coverage. That is, in an in-car environment with a typical vehicle whip antenna, the analog and HD were noticeably more congruent than at the prior -14dbc level.

Entercom appreciates the continued grant of EA believing that the greatest current value is to gather field 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.

The undersigned is authorized to represent that neither Entercom nor any party holding an attributable interest in Entercom is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

If any information is desired in connection with this matter, please contact me at 484-270-6312 or [laura.berman@entercom.com](mailto:laura.berman@entercom.com). Kindly date stamp the enclosed copy of this letter acknowledging its receipt by your office and return it to me in the enclosed self-addressed stamped envelope.

Respectfully submitted,



Laura M. Berman

cc: Rodolfo Bonacci, Audio Division