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April 2, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
ATTN: Media Bureau, Audio Division

Accepted / Filed

APR -2 2019

Federal Communications Commission
Office of the Secretary

Re: Request for Extension of Experimental Authorization
University of Central Florida
NCE Station WUCF-FM, Orlando, FL (Fac. ID 69229)

Dear Ms. Dortch:

On behalf of the University of Central Florida ("UCF"), licensee of noncommercial educational radio station WUCF-FM, Orlando, Florida, we respectfully request a twelve (12) month extension, up to and including May 18, 2020, for the experimental authorization previously granted to allow testing of hybrid digital FM in-band on-channel ("IBOC") operation with asymmetrical power levels in the digital sidebands. See FCC File Nos. 20170501AAJ, 20180426ABX. This request is submitted pursuant to Section 5.203, *et. seq.*, of the FCC's Rules, 47 C.F.R. §5.203.

UCF originally applied on May 1, 2017 for this experimental authorization, and the FCC granted the experimental authorization by letter dated May 15, 2017. Most recently, UCF applied for an initial extension of the experimental authorization on April 26, 2018, and the FCC granted the extension on May 18, 2018 (copy enclosed). The authorization is currently due to expire on May 18, 2019. In connection with this request for extension of the experimental authorization, UCF provides the enclosed interim report detailing progress, methodology employed and the results obtained in connection with WUCF-FM's authorized IBOC operation with asymmetrical power levels in the digital sidebands.

UCF respectfully submits that the public interest will be well served by the requested extension for WUCF-FM's continued experimental authorization by permitting UCF to obtain additional experience and continue to provide improved service to its local community with IBOC operation including asymmetrical power levels in the digital sidebands.

UCF hereby certifies that UCF, nor any party to the application, is subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. Should any questions arise concerning this matter, kindly contact this office.

Sincerely,



Barry S. Persh
Counsel for UCF

Enclosures

cc: Rodolfo Bonacci (Rodolfo.Bonacci@fcc.gov)



WUCF FM
Experimental Authority Interim Progress Report
Asymmetrical IBOC sidebands
March 27, 2019

WUCF-FM (Licensee - University of Central Florida) originally applied on May 1, 2017 for experimental authorization for asymmetrical IBOC sidebands. The FCC granted this request for experimental authorization by letter dated May 15, 2017. The grant was extended on May 18, 2018. WUCF-FM operates its IBOC carriers at -14dBc for the lower sideband and -10dBc for the upper sideband. WUCF-FM has operated its IBOC carriers in compliance with the grant since May 15, 2017. The technical parameters are as follows:

Analog ERP:	0.36 kilowatts (kW)-H, 5.6 kW-V5
Digital LSB ERP:	0.0140 kW-H, 0.225 kW-V
Digital USB ERP:	0.036 kW-H, 0.56 kW-V.

WUCF-FM has received no complaints of interference by listeners nor other broadcasters as a result of operating under the parameters authorized in the experimental grant.

The WUCF-FM engineering team has determined the asymmetrical operation of the IBOC sidebands remarkably improves digital reception within the service area. WUCF-FM continues to monitor, observe, and evaluate the asymmetric IBOC sideband operation. WUCF-FM desires to continue the experimental operation to further evaluate the asymmetrical IBOC sideband operation.

Thank you for your consideration,

Bruce Doerle
Chief Engineer
WUCF FM

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET, SW
WASHINGTON, DC 20554

MEDIA BUREAU
AUDIO DIVISION
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May 18, 2018

Barry Persh, Esq.
Gray Miller Persh LLP
1200 New Hampshire Avenue, NW #410
Washington, DC 20036

Re: WUCF-FM, Orlando, Florida
University of Central Florida
Facility ID No. 69229
File No. 20170501AAJ

**Request for Extension of Experimental
Authority**

Dear Counsel:

This letter concerns the above-referenced April 28, 2018, request submitted by University of Central Florida (UCF), licensee of non-commercial educational FM Station WUCF-FM, Orlando, Florida,¹ seeking extension of its current experimental authority² permitting WUCF to conduct testing of hybrid digital FM in-band on-channel (IBOC) operation with asymmetric power levels in the digital sidebands. The experimental authority is requested pursuant to Section 5.203 of the Commission's Rules.³

UCF is seeking extension of its current experimental authority, which permits operation of WUCF with lower sideband (LSB) digital ERP of -14 dBc⁴ and upper sideband (USB) digital ERP of -10 dBc, in order to continue operation and testing using this mode of digital transmission. In support of its extension request, as required, UCF submitted an interim report discussing the methodology and equipment employed and the progress and results of its testing pursuant to the current experimental authorization. In the report, UCF states that WUCF commenced asymmetric digital sideband power operation on May 15, 2017, and, since commencement, the authorized digital operation has been continuous. UCF also states that no complaints of interference resulting from the currently authorized experimental operation have been received.

¹ File Number BMLD-20140515ADY. WUCF, Facility ID No. 69229, is licensed to operate on channel 210C3 (89.9 megahertz) using 0.36 kilowatts (kW) horizontally polarized (H) and 5.6 kw vertically polarized (V) effective radiated power (ERP), and 145 meters (H) and 148 meters (V) antenna radiation center height above average terrain, at a transmitter site described by geographic coordinates 28° 35' 26" North Latitude, 81° 12' 18" West Longitude, referenced to 1927 North American Datum.

² File No. 20170501AAJ.

³ 47 CFR § 5.203 (Section 5.203).

⁴ Decibels relative to analog carrier.

Our review of the request for extension of experimental authority shows that it meets the requirements for experimental operations set forth in Section 5.203, as well as the contour nonoverlap and other technical requirements of the Media Bureau's Order adopted January 27, 2010, in Mass Media Docket No. 99-325.⁵ Accordingly, the extension request is **HEREBY GRANTED**. WUCF may continue to operate with digital ERP as follows:

Analog ERP:	0.36 kilowatts (kW)-H, 5.6 kW-V ⁶
Digital LSB ERP: ⁷	0.0140 kW-H, 0.225 kW-V
Digital USB ERP:	0.036 kW-H, 0.56 kW-V.

This experimental authority expires on **May 18, 2019**. This authority is specifically conditioned on the lack of objectionable interference. A report detailing the methodology employed and the results obtained must be submitted within 90 days following the conclusion of the experimental operation. Any request for extension of this experimental authority should be filed at least 30 days prior to the expiration date of the authority. Additionally, an extension request must include an interim version of the aforementioned report that details the progress of the experimental operation as of the filing date of the request.

Sincerely,



Rodolfo F. Bonacci
Assistant Division Chief
Audio Division
Media Bureau

cc: Bruce Doerle, Chief Engineer (via email)

⁵ *Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service*, Order, 25 FCC Rcd 1182 (MB 2010).

⁶ All ERP values rounded in accordance with 47 CFR § 73.212(a).

⁷ Digital ERP values shown are for MP1 service mode. The licensee must adjust the station's asymmetric digital sideband ERP values in accordance with NRSC guideline "NRSC-G202, FM IBOC Total Digital Sideband Power for Various Configurations" (September 2010) if operating using a service mode other than MP1.