

2019 SEP 24 PM 2: 21

The Law Office of  
**Dan J. Alpert**  
2120 N. 21st Rd.  
Arlington, VA 22201  
**DJA@COMMLAW.TV**

(703) 243-8690

(703) 243-8692 (FAX)

September 20, 2019

Accepted / Filed

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

SEP 20 2019

Federal Communications Commission  
Office of the Secretary

**Re: Station WYCT(FM)**  
**Pensacola, FL**  
**Facility No. 539**

Dear Ms. Dortch:

ADX Communications of Pensacola hereby requests an extension of the attached Experimental Authorization for testing of hybrid digital FM in band, on-channel ("IBOC") operation with asymmetric power levels in the digital sidebands. WYCT has operated in asymmetrical mode with good HD reception since grant of the Experimental Authorization with no reported adverse impacts on either first adjacent channel stations.

If there are any questions, please contact this office.

Very truly yours,

  
Dan J. Alpert

*Counsel for ADX Communications of  
Pensacola*

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12<sup>th</sup> STREET, SW**  
**WASHINGTON, DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS: (202) 418-2730**  
**HOME PAGE: [www.fcc.gov/media/radio/audio-division](http://www.fcc.gov/media/radio/audio-division)**

**PROCESSING ENGINEER: Susan N. Crawford**  
**TELEPHONE: (202) 418-2754**  
**GROUP FACSIMILE: (202) 418-1411**  
**INTERNET ADDRESS: [Susan.Crawford@fcc.gov](mailto:Susan.Crawford@fcc.gov)**

September 21, 2017

Dan J. Alpert, Esq.  
The Law Office of Dan J. Alpert  
2120 N. 21<sup>st</sup> Road  
Arlington, VA 22201

Re: WYCT(FM), Pensacola, Florida  
ADX Communications of Pensacola  
Facility ID No. 539  
File No. 20170905AAO

**Request for Experimental Authority**

Dear Counsel:

The staff has under consideration the September 5, 2017, request for experimental authority submitted on behalf of ADX Communications of Pensacola (ADX), licensee of commercial FM station WYCT, Pensacola, Florida,<sup>1</sup> to permit WYCT 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.<sup>2</sup>

The request states that ADX is seeking experimental authority to operate WYCT with lower sideband (LSB) digital effective radiated power (ERP) of -13 dBc<sup>3</sup> and upper sideband (USB) digital ERP of -10 dBc.

Our review indicates that the proposed WYCT digital operation complies with the contour nonoverlap and other technical requirements of the Media Bureau's *Order* adopted January 27, 2010, in MM Docket No. 99-325<sup>4</sup>, and the request for experimental authority meets

---

<sup>1</sup> File Number BLH-20030127ADU.

<sup>2</sup> 47 CFR § 5.203 (Section 5.203).

<sup>3</sup> Decibels relative to analog carrier.

<sup>4</sup> *Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service*, MM Docket No. 99-325, Order, 25 FCC Rcd 1182 (MB 2010) (Order).

the requirements for experimental operations set forth in Section 5.203. Accordingly, the request is **HEREBY GRANTED**. WYCT may operate with increased digital ERP as follows:

Analog ERP:	100 kilowatts (kW) H&V <sup>5</sup>
Digital LSB ERP: <sup>6</sup>	2.5 kW
Digital USB ERP:	5.0 kW

This experimental authority expires on **September 21, 2018**. 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 detailing the progress of the experimental operation as of the filing date of the request.

Sincerely,



Susan N. Crawford  
Senior Engineer  
Audio Division  
Media Bureau

cc: ADX Communications of Pensacola  
Charles M. Anderson (via email)

---

<sup>5</sup> All ERP values rounded in accordance with 47 CFR § 73.212(a).

<sup>6</sup> Digital ERP values shown are for MP1 service mode. The licensee must adjust the station's asymmetric total 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.