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Federal Communications Commission Office of the Secretary ORIGINAL wiley

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VIA HAND DELIVERY

February 24, 2020

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

Re: Request for Extension of Experimental Authority to Test Hybrid Digital IBOC Operation Using Asymmetric Power Levels in the Digital Sidebands WUSF(FM), Tampa, Florida (Facility ID No. 69122)

Dear Ms. Dortch:

Pursuant to Section 5.203 of the Commission's rules and the Audio Division's letter grant of March 15, 2019 (File No. 20190304AEX), the University of South Florida ("USF"), the licensee of noncommercial educational FM radio station WUSF, Tampa, Florida, by counsel, hereby submits this request for a 12-month extension of the experimental authority previously granted which has permitted WUSF to conduct testing of hybrid FM digital in-band on-channel ("IBOC") operation using asymmetric power levels in the digital sidebands.

USF's current experimental authority permits WUSF to test digital operation using the IBOC technology with digital effective radiated powers of -14 dBc on the upper sideband and -11 dBc on the lower sideband. Such authority expires April 9, 2020.

Station WUSF began digital IBOC operation on January 13, 2012, and has operated with asymmetric digital sideband powers since March 6, 2012, pursuant to an experimental authorization originally granted in FCC File No. 20120301AEU, as extended. Since commencing operations with increased digital power asymmetrically, WUSF has determined that the digital cliff has been significantly extended, thus providing improved digital reception to WUSF's listeners within the station's protected service contour. The improved digital reception has been confirmed by empirical testing conducted by WUSF's technical staff utilizing an aftermarket HD radio at various locations within the station's coverage area.

During the past year of asymmetrical digital operation, the licensee has carefully monitored its operations to ensure that its experimental authority does not adversely affect the adjacent channel operations of WUCF-FM, Channel 210C3, Orlando, Florida, or WKSG-FM, Channel 208C2, Cedar Creek, Florida, and has not received any complaints from any station currently on the air.

In view of the foregoing, USF respectfully submits that the public interest would be well served by an extension of the station's experimental authority to continue operations with asymmetric power levels in the digital sidebands.

Since the requesting party is an agency of the State of Florida, no filing fee is required for this submission. In addition, undersigned counsel is authorized to certify that neither the licensee nor any party to this request 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.

If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

John M. Burgett

cc: Rodolfo Bonacci, FCC (by e-mail)