## Gray Miller Persh LLP

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April 6, 2020

filed via email to: Rodolfo.Bonacci@fcc.gov, James.Bradshaw@fcc.gov

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

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

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 15, 2021, for the station's 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, 20190402ABE. 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 extension of the experimental authorization on April 2, 2019, and the FCC granted the extension on May 15, 2019. In connection with this request for an 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 Persk Barry S. Persh Counsel for UCF

Enclosures

## WUCF CENTRAL FLORIDA'S STORYTELLER

WUCF FM Experimental Authority Interim Progress Report Asymmetrical IBOC sidebands March 16, 2020

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 and May 15, 2019. 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: Digital LSB ERP: Digital USB ERP: 0.36 kilowatts (kW)-H, 5.6 kW-V5 0.0140 kW-H, 0.225 kW-V 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,

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William Dotson Director of Operations & Engineering WUCF

## wucf.org