## Gray Miller Persh LLP

Attorneys-at-Law 2233 Wisconsin Avenue, NW Suite 226 Washington, DC 20007 Derek Teslik
Partner
dteslik@graymillerpersh.com
202-559-7489
www.graymillerpersh.com

March 15, 2021

## **VIA EMAIL**

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, DC 20554

Attn: Priscilla Lee, Audio Division, Media Bureau

Dear Ms. Dortch:

On behalf of the University of Central Florida ("UCF"), licensee of noncommercial educational FM radio station WUCF-FM, Orlando, Florida, and pursuant to Section 5.203 of the Commission's rules, 47 C.F.R. § 5.203, this letter respectfully requests extension of the station's experimental authority for one year. This would allow WUCF-FM to continue to operate full time with asymmetrical hybrid digital sideband power. UCF respectfully submits that the public interest will be well served by the requested experimental authorization by permitting UCF to obtain additional experience and provide improved service to its local community with IBOC operation including asymmetrical power levels in the digital sidebands. An interim report detailing the progress of the experimental operation thus far is attached hereto.

UCF hereby certifies that neither UCF nor any party to this application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. UCF is a noncommercial educational licensee and operates WUCF-FM on a noncommercial basis. Moreover, UCF qualifies as a governmental entity. The licensee is therefore exempt from FCC filing fee and regulatory fee requirements for WUCF-FM pursuant to Sections 1.116 and 1.1162 of the Commission's rules. Please direct any questions regarding this matter to my attention.

Sincerely,

Derek Teslik

Counsel to University of Central Florida

WUCF FM Experimental Authority Interim Progress Report Asymmetrical IBOC sidebands March 10, 2021

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, May 15, 2019 and May 15, 2020. 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,

William Dotson

M V

Director of Operations & Engineering

WUCF