



October 13, 2021

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On behalf of Winona State University, licensee of KQAL-FM (Facility ID 72955, File No. 2020916AB):

Doug,

Winona State University is requesting that you file an extension of KQAL's Experimental Authority for FM Asymmetric Side-band IBOC operations granted on November 18, 2020. As I understand it such applications must be filed 30 days in advance of expiration.

KQAL has been operating as an HD station with lower sideband (LSB) digital effective radiated power (ERP) of -17 dBc and upper sideband (USB) digital ERP of -13 dBc to assess IBOC coverage and signal penetration in various environments, including within buildings and in vehicles.

KQAL feels that more experimentation is needed, hence the request for an extension.

KQAL's coverage area is in a geographically complex area, known as the driftless region, with many bluffs and valleys. This provides difficult coverage for an analog FM station. KQAL's conversion to HD solved many multipath reception issues when driving in the narrow valleys surrounding Winona.

Casual observation and experimentation with symmetrical sidebands of -17dBc revealed that HD reception was impaired when driving in those difficult reception areas. In addition, building penetration was noticeably impaired.

KQAL has had no reports of interference while operating with asymmetric digital sidebands, coverage is better, and we feel continuing to operate in this mode would best serve the needs of our HD listeners.

Sincerely,

Mike Martin

KQAL Operations Manager

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