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November 9, 2012

VIA OVERNIGHT DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Attention: Audio Division
Media Bureau

Re: WBAL(AM), Baltimore, Maryland
Request for MDCL Experimental Authorization

Dear Ms. Dortch:

Pursuant to Section 73.1510 of the Commission's Rules and the Commission's Public Notice in DA 11-1535 (September 13, 2011), this letter shall serve as a request by Hearst Stations Inc. ("Hearst"), licensee of AM Radio Station WBAL(AM), Baltimore, Maryland, for experimental authorization to evaluate Modulation Dependent Carrier Level ("MDCL") technology.

As described in DA 11-1535, use of MDCL technology involves operation with transmitter power levels below 90 percent of a station's nominal licensed power and, therefore, such reduced power operation would be in variance with Section 73.1560(a) of the Commission's Rules.

Hearst projects that implementation of MDCL technology on WBAL(AM)'s existing transmitter could reduce the power consumption of WBAL(AM)'s transmitter by 20 to 40 percent without compromising WBAL(AM)'s audio quality. The Harris Corporation, the manufacturer of WBAL(AM)'s transmitter, provides two distinct MDCL algorithms for WBAL(AM)'s transmitter—Adaptive Carrier Control ("ACC Plus") and Amplitude Modulation Companding ("AMC Plus"). Subject to the Commission's grant of the instant request, Hearst desires to experiment with both ACC Plus and AMC Plus operations to determine which algorithm provides the greatest power savings without materially impacting WBAL(AM)'s audio quality. Hearst wishes to commence experimental MDCL operation as soon as possible.

Assuming Hearst experiences favorable results from the requested experimental operations, Hearst anticipates that it would subsequently request a waiver of Section 73.1560(a) for continued use of MDCL technology.

Because grant of the instant request for experimental authorization would facilitate WBAL(AM)'s evaluation of MDCL technology in an effort to achieve substantial energy savings, grant of the instant request would be in the public interest.

Pursuant to DA 11-1535, no fee is required in connection with the instant request, and Hearst would not be required to file reports on its experimentation and results of its evaluation of MDCL technology.

If any questions should arise during the course of your consideration of this request, it is respectfully requested that you communicate with this office.

Sincerely,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.

Coe W. Ramsey
Counsel to Hearst Stations Inc.

cc: Susan Crawford (via e-mail)
Ann Gallagher (via e-mail)

ANTI-DRUG ABUSE ACT CERTIFICATION

By checking "Yes", the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, refer to 47 C.F.R. §1.2002(b).

☒ Yes

☐ No

Hearst Stations Inc.

By:


David J. Barrett, President

Date: November 14, 2012