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February 13, 2020

**By Hand Delivery**

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

**Accepted / Filed**

**FEB 13 2020**

Federal Communications Commission  
Office of the Secretary

Re: WGCU-FM, Fort Myers, Florida, Facility ID No. 69042  
Request for Experimental Authority to Operate with  
Asymmetrical Hybrid Digital Sideband Power

Dear Ms. Dortch:

On behalf of the Florida Gulf Coast University Board of Trustees ("FGCU"), licensee of noncommercial educational FM radio station WGCU-FM, Fort Myers, 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 existing experimental authority for one year. This would allow WGCU-FM to continue to operate full-time with asymmetrical hybrid digital sideband power. FGCU respectfully submits that the public interest will be well served by the requested extension of experimental authorization by permitting FGCU to continue to obtain 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.

FGCU hereby certifies that neither FGCU 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. FGCU is a noncommercial educational licensee and operates WGCU-FM on a noncommercial educational basis. Moreover, FGCU qualifies as a governmental entity. The licensee is therefore exempt from FCC filing fee and regulatory fee requirements for WGCU-FM pursuant to Sections 1.1116 and 1.1162 of the Commission's rules. Please direct any questions regarding this matter to this office.

Sincerely,



Derek Teslik  
Counsel to Florida Gulf Coast University Board of  
Trustees

REPORT ON IMPLEMENTATION OF ASYMMETRICAL  
SIDE BAND INJECTION IN HYBRID FM IBOC SYSTEM

FM BROADCAST STATION WGCU-FM  
(FACILITY ID 69042)  
FORT MYERS, FLORIDA  
CHANNEL 211C1, 90.1 MHz

1. The instant report was prepared on behalf of The Florida Gulf Coast University Board of Trustees, licensee of FM Broadcast Station WGCU-FM, Fort Myers, Florida (Facility ID No. 69042).
2. WGCU-FM is licensed for analog FM operation on Channel 211C1 (90.1 MHz), with a nominal non-directional effective radiated power of 100 kW with an antenna height above average terrain of 248 m. WGCU-FM received authorization for experimental authority for in-band on-channel (IBOC) operation with asymmetric power level in the digital sidebands on March 26, 2019. See FCC File No. 20190226AAV. The IBOC system is authorized with a lower sideband level of -14 dBc and an upper sideband level of -10 dBc.
3. The results of the experimental IBOC operation for WGCU-FM have proven to be quite successful thus far. From an IBOC coverage perspective, the implementation of the asymmetrical operation has improved digital IBOC coverage to areas of IBOC previously subject to intermittent operation or poor coverage. In particular, complaints from listeners of the IBOC programming in the Naples area have been eliminated since the implementation of the IBOC asymmetrical system. Also exclusive digital IBOC coverage has been report at locations beyond the predicted analog 60 dBu contour, including South Naples and Bradenton.
4. There have been no interference complaints since the implementation of the experimental asymmetrical sideband IBOC operation.
5. There have been no transmission issues identified by the asymmetrical sideband IBOC operation. It has been observed that the Nautel transmitter power meter now exhibits some fluctuation in asymmetrical sideband mode. According to the

transmitter manufacturer, this is a normal indication due to the AM modulation generated by the system and it does not reflect any improper power output by the system.

6. With the asymmetrical sideband IBOC operation, WGCU-FM is able to broadcast a second high-fidelity classical music service that would otherwise be more limited in reach at the -14 dBc symmetrical sideband level. In addition, WGCU-FM is able to provide a temporary third audio channel that can be employed for news and special events as needed.

7. Overall, given the outstanding success of the operation thus far, WGCU-FM would like to continue its service and observations of the asymmetrical sideband IBOC system to facilitate the potential for greater implementation for the industry in the future.



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January 30, 2020