

John M. Burgett
202.719.4239
jburgett@wiley.law



Wiley Rein LLP
2050 M Street NW
Washington, DC 20036
Tel: 202.719.7000

wiley.law

February 9, 2023

VIA EMAIL DELIVERY

James Bradshaw
Senior Deputy Division Chief
Media Bureau, Audio Division
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Request for Experimental Authority
to Test Hybrid Digital IBOC Operation Using
Asymmetric Power Levels in the Digital Sidebands
WUSF(FM), Tampa, Florida (Facility ID No. 69122)

Dear Mr. Bradshaw:

Pursuant to Section 5.203 of the Commission's rules, the University of South Florida ("USF"), the licensee of noncommercial educational FM radio station WUSF, Tampa, Florida, by counsel, hereby requests experimental authority to conduct testing of WUSF's hybrid FM digital in-band on-channel ("IBOC") operation using asymmetric power levels in the digital sidebands.

USF's current experimental authority permitting such operation (File No. 20180316ABU, as extended) expires on April 9, 2023, and pursuant to Section 5.71(c) of the Commission's rules cannot be further extended.¹ Accordingly, USF hereby requests a new grant of experimental authority to permit WUSF to test digital operation using the IBOC technology with digital effective radiated powers of -14 dBc on the upper sideband and -11 dBc on the lower sideband. USF certifies that such operation complies with the contour nonoverlap and other technical requirements of the Media Bureau's Order in *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service*, 25 FCC Rcd 1182 (MB 2010).

Station WUSF began digital IBOC operation on January 13, 2012, and has operated with asymmetric digital sideband powers since March 6, 2012, pursuant to (1) an experimental authorization granted in File No. 20120301AEU, as extended, and (2) an experimental authorization granted in File No. 20180316ABU, as extended. Since commencing operations with increased digital power asymmetrically, WUSF has determined that the digital cliff has been significantly extended, thus providing improved digital reception to WUSF's listeners within the station's protected service contour. The improved digital reception has been confirmed by empirical testing conducted by WUSF's technical staff utilizing an aftermarket HD radio at various locations within the station's coverage area.

¹ See Audio Division's email grant dated March 11, 2022 (File No. 20220218AAB).

February 9, 2023

Page 2

During the past year of asymmetrical digital operation, the licensee has carefully monitored its operations to ensure that its experimental authority does not adversely affect the adjacent channel operations of WUCF-FM, Channel 210C3, Orlando, Florida, or WKSG-FM, Channel 208C2, Cedar Creek, Florida, and has not received any complaints from any station currently on the air.

In view of the foregoing, USF respectfully submits that the public interest would be well served by a grant of experimental authority to allow WUSF to continue operations with asymmetric power levels in the digital sidebands.

Since the requesting party is an agency of the State of Florida, no filing fee is required for this submission. In addition, undersigned counsel is authorized to certify that neither the licensee nor any party to this request 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.

If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

//s// John M. Burgett

John M. Burgett

cc: Rodolfo Bonacci, FCC (by e-mail)