



2400 Market Street, 4th Floor, Philadelphia, PA 19103

Laura Berman
Senior Counsel

September 18, 2020

Via EMAIL

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554
james.bradshaw@fcc.gov
rodolpho.bonacci@fcc.gov

Attn: Media Bureau, Audio Division

**RE: Station WOCL(FM), Deland, FL, Facility ID No. 10138
File Nos. 20170905ABE; 20181011ABK; 20191112ABN
Interim Report on IBOC Asymmetrical Sideband Operation
and Request for Extension of Experimental Authority**

Dear Ms. Dortch:

On September 25, 2017, via a letter from Ms. Susan Crawford of the Commission's Audio Division and pursuant to a request by CBS Radio Stations Inc., then licensee of WOCL, Deland, Florida (Facility ID No. 10138) (the "Station"), experimental authority (EA) was granted to the Station to operate with asymmetrical IBOC sidebands.¹ Specifically, the Station was authorized to operate with a digital power of -10 dBc on its upper sideband and -14 dBc on its lower sideband. Station operation previous to asymmetrical operation under the EA was at -17 dBc, symmetrical. On October 12, 2018 and then again on December 17, 2019, that EA was extended.

Asymmetrical operation by the Station was initiated on September 28, 2017, and has been continuous. There have been no complaints of interference from any party while operating in this mode. The transmitter, a Gates Air Fax20, has experienced no issues. The main antenna is an ERI 1183-8CP. Since operating pursuant to EA, Entercom has noticed a substantial improvement in Station reception in the outer fringe of the signal, as well as indoor reception. The improved reception is particularly noticeable in lower priority services, such as HD3.

Entercom appreciates the continued grant of EA believing that the greatest current value is to gather filed data regarding interference and to hopefully use that data to support transitioning full HD power asymmetrical operation to normal rather than experimental authority. Based on the

¹ The Station is now licensed to Entercom License, LLC ("Entercom").

ETM:120092

Entercom Communications Corp.

Voice: (484) 270-6312 • Fax (610) 660-5662 • www.entercom.com • laura.berman@entercom.com

information herein it is requested that the current experimental authority for the Station be further extended for an additional year.

In accordance with the instructions set forth in *Audio Division Announces Procedures Related to Coronavirus*, Public Notice, DA 20-266 (rel. Mar. 13, 2020), Entercom is submitting this application via email.

The undersigned counsel is authorized to represent that neither the licensee nor any party holding an attributable interest in the licensee is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

If any information is desired in connection with this matter, please contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'L. Berman', followed by a long horizontal flourish.

Laura M. Berman