



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

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John M. Burgett
202-719-4239
jburgett@wileyrein.com

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch:

Pursuant to Section 5.203 of the Commission's rules, the University of South Florida ("USF"), the licensee of the above-referenced station, by counsel, hereby requests experimental authority to test 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 expires April 13, 2018, and pursuant to Section 5.71(c) of the Commission's rules cannot be further extended. 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 an experimental authorization granted in FCC File No. 20120301AEU, 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 after-market HD radio at various locations within the station's coverage area.

Station WUSF's operation with the asymmetric power levels requested herein will not adversely affect the adjacent channel operations of WUCF-FM, Channel 210C3, Orlando, Florida, or WKSG-FM, Channel 208C2, Cedar Creek, Florida.



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Specifically, as demonstrated previously to the Commission (see FCC File No. 20120301AEU), WUSF can avoid interference to WUCF-FM and WKSG-FM by operating with digital effective radiated powers of -14 dBC on the upper sideband and -11 dBC on the lower sideband. The viability of this operation is evidenced by the fact that WUSF has been operating for several years with the asymmetric digital power levels specified herein and has never received an interference complaint.

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 operate 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,

A handwritten signature in blue ink, appearing to read "John M. Burgett", is written over the typed name.

John M. Burgett

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