



WASHINGTON, D.C. OFFICE
flour mill building
1000 potomac street nw
suite 200
washington, d.c. 20007-3501
TEL 202 965 7880 FAX 202 965 1729

anchorage, alaska
beijing, china
new york, new york
portland, oregon
seattle, washington
GSBLAW.COM

G A R V E Y S C H U B E R T B A R E R

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to MELODIE A. VIRTUE
mvirtue@gsblaw.com TEL EXT 2527

March 10, 2016

OUR FILE NO. 22436-00100-65

By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Accepted/Files

MAR 10 2016

Federal Communications Commission
Office of the Secretary

Re: Broadcast Station KING-FM (NCE), Seattle, WA
Facility ID No. 11755, FRN # 0020868501
Request for Extension of Experimental Authority to Operate with
Asymmetrical Hybrid Digital Sideband Power
FCC File No. 20150403ABZ

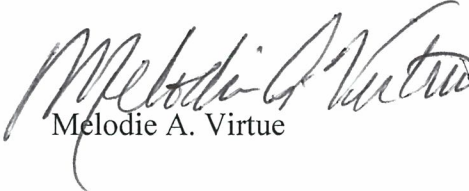
Dear Ms. Dortch:

On behalf of Classic Radio ("Classic"), licensee of non-commercial educational FM radio station KING-FM, Seattle, Washington, pursuant to FCC Rule 5.203, this letter is written to request an extension of its experimental authority for one year to operate KING-FM full-time with asymmetrical hybrid digital sideband power. The initial authorization was granted by letter dated April 13, 2015, from Susan N. Crawford in the Audio Division of the Media Bureau. A copy of that letter is attached along with the report from KING-FM Chief Operator, Michael Brooks, detailing the methodology employed and the results obtained.

Also enclosed is the Anti-Drug Abuse Certification of the licensee. No filing fee is required for this type of request.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,


Melodie A. Virtue

MAV:cll
Enclosures (3)
cc: Susan Crawford (Susan.Crawford@fcc.gov)

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET, SW
WASHINGTON, DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

PROCESSING ENGINEER: Susan N. Crawford
TELEPHONE: (202) 418-2754
GROUP FACSIMILE: (202) 418-1411
INTERNET ADDRESS: Susan.Crawford@fcc.gov

April 13, 2015

Melodie A. Virtue, Esq.
Garvey Schubert Barer
1000 Potomac Street, NW
Fifth Floor
Washington, DC 20007-3501

Re: KING-FM, Seattle, Washington
Classic Radio
Facility ID No. 11755
File No. 20150403ABZ

Request for Experimental Authority

Dear Counsel:

The staff has under consideration the April 3, 2015, request for experimental authority submitted on behalf of Classic Radio, licensee of commercial FM Station KING-FM, Seattle, Washington,¹ to permit Station KING-FM to conduct testing of hybrid digital FM in-band on-channel ("IBOC") operation with asymmetric power levels in the digital sidebands. The experimental authority is requested pursuant to Section 5.203 of the Commission's Rules.²

The request states that Classic Radio is seeking experimental authority to operate Station KING-FM with lower sideband ("LSB") digital effective radiated power ("ERP") of -10 dBc³ and upper sideband ("USB") digital ERP of -14 dBc. In support of its request, Classic Radio submitted an engineering study showing that the proposed operation complies fully with the contour nonoverlap requirements of the Media Bureau's *Order* adopted January 27, 2010, in MM Docket No. 99-325⁴ for operation with -10 dBc LSB digital ERP.

¹ File Number BMLED-20110502AEJ.

² 47 C.F.R. § 5.203 ("Section 5.203").

³ Decibels relative to analog carrier.

⁴ See *Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service*, Order, 25 FCC Rcd 1182 (2010) ("Order").

Our review indicates that the proposed Station KING-FM operation complies with the contour nonoverlap and other technical requirements of the *Order*⁵ and the request for experimental authority meets the requirements for experimental operations set forth in Section 5.203. Accordingly, the request is HEREBY GRANTED. Station KING-FM may operate with increased digital ERP as follows:

Analog ERP:	68 kilowatts ("kW") Max-DA, H&V
Digital LSB ERP:	6.8 kW
Digital USB ERP:	2.7 kW.

This experimental authority expires on **April 13, 2016**. This authority is specifically conditioned on the lack of objectionable interference. A report detailing the methodology employed and the results obtained must be submitted within 90 days following the conclusion of the experimental operation. Any request for extension of this experimental authority should be filed at least 30 days prior to the expiration date of the authority. Additionally, an extension request must include an interim version of the aforementioned report that details the progress of the experimental operation as of the filing date of the request.

Sincerely,



Susan N. Crawford
Audio Division
Media Bureau

cc: Classic Radio
Erik C. Swanson P.E. (via email)

⁵ *Id.*

KING FM
10 Harrison Street, Suite 100
Seattle, WA 98109
RE: Renewal of Experimental Request 20150403ABZ

February 25, 2016

In the matter of KING FM's Experimental Authorization granted by the FCC April 13, 2015
KING FM submits the following report and request pursuant to the conditions of the Experimental Authority.

KING FM has operated fulltime with Asymmetrical Hybrid IBOC sidebands since authority was granted April 13, 2015 for a total of 7656 hours.

The transmitter used was a Nautel GV-30 with 68 Kilowatts ERP of Analog power, Digital LSB of -10dBc (6.8 KW) and -14dBc (2.7KW).

KING FM announced to the public that it had made increases to its HD signal. During these experimental broadcasts we have noted an increased public awareness of our HD signals. We submit that this is due to two factors, the improvement in our HD transmission and an increase in the number of HD receivers in the market place.

KING FM operates with three IBOC channels with data streams of 64kb/s, 32 kb/s and 24 kb/s

Anecdotal listening tests indicate that the increased HD signal strength allows the IBOC signal to much more closely match the analog FM transmission. Listening tests were conducted using an aftermarket HD auto receiver as well as a small personal "Walkman" type receiver. Both receivers demonstrated a marked improvement in both outdoor reception and building/tunnel penetration. Studio monitoring is done using an Inovonics 632 HD receiver, and a Sony consumer grade receiver.

KING FM has received no complaints of interference or signal degradation during the course of these experimental broadcasts.

Additionally an extension will afford KING FM continued ability to provide feedback to Nautel on the efficacy of the asymmetrical sideband operation of its transmitter.

In light of these results and findings KING FM proposes to the commission that we continue to operate with asymmetrical sidebands at the ERP granted in our original experimental license.

During this operation KING FM will continue to monitor closely signal reports and ensure that its transmissions remain within our licensed parameters.

Respectfully submitted,



Michael Brooks
Chief Operator
KING-FM
Facility ID No. 11755

☒ Yes ☐ No

Name of Applicant:

CLASSIC RADIO

Sanford Rosen

Secretary

3.9.16