

February 17, 2007

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 10th Street, N.W.
Washington, D.C. 20554
ATTN: Audio Division

BUFILE: No. 0300-00000000

Re: **Request for Experimental Authorization For Digital Radio**

BU File Station KJHH (FM) Channel 44 Houston, TX

Facility ID No. 61151 / PERM 00056 / 1877

Dear Ms. Dortch:

On behalf of the University of Houston System (the "University"), licensee of noncommercial educational radio station KJHH (FM) Houston, Texas (the "Station"), we hereby request a one-year experimental authorization for testing of split-signal digital radio broadcasting, as described below:

Background

The University previously applied for experimental authority for the Station's digital multiplexing operation on March 14, 2005, pursuant to Section 14.15(d) of the FCC's Rules and *In re Commission Clarifies Policy Regarding Multiple Audio Streams In IBOC Transmissions*, 504 FCC Record No. 107-215 (Oct. 20, 2005). The Commission granted the University's application on March 23, 2005, and later granted an extension of the experimental authorization on March 17, 2006. The Commission also granted a subsequent request to modify the experimental authorization to authorize operation in all extended hybrid modes, including MP3, on November 8, 2006, and the resulting authorization is now due to expire on November 8, 2007. The University also applied for Special Temporary Authority to utilize the Station's auxiliary antenna for digital use, and the Commission granted that request on September 20, 2006.

Requested Authorization

The University now requests experimental authorization to allow its multiple digital streams to be multiplexed with analog content on the Station's noncommercial news and classical music programming content. Presently, the Station's main analog signal broadcasts a dual program format: FM news and classical music. As a result, the Station's HD-1 digital channel currently simulcasts the analog programming and also provides the dual news and classical music format. The Station's HD-2 digital channel currently simulcasts the "HD audio" of

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whether any issues may arise in difficult mobile reception areas, where blending between analog and digital signals may cause a receiver to switch back and forth between the two signals. The University believes that its testing of the above-described operation will help provide additional information and data concerning both the benefits of such broadcasts and the potential drawbacks for listeners.

The University notes that during the periods from 5:00 am to 9:00 am and from 4:00 pm to 7:00 pm, when data indicates that in-car listening is the dominant mode of tune-in, the Station's analog and HD-1 programming would be the same – NPR news – such that no issues with receiver blend from HD to analog should arise during those times. The University further submits that the proposed mode of broadcast is not predicted to cause any interference with other stations, nor will it impact the Station's analog signal in any way.

No charge will be made to, nor any fee collected from, any member of the public in connection with this experimental operation.

The University is a noncommercial educational licensee and operates the Station on a noncommercial educational basis. Moreover, the University qualifies as a governmental entity. This station is therefore exempt from FCC filing fee requirements pursuant to Section 1.1114 of the Commission's Rules, and the facility is exempt from FCC regulatory fees, pursuant to Section 1.1162 of the Rules. This request is also exempt from the Anti-Drug Abuse Act certification requirements pursuant to Section 1.2002(c) of the Rules.

Should any questions arise concerning this matter, kindly contact the undersigned counsel.

Sincerely,

Barry S. Persh
Counsel for the University

Enclosure

cc: Ann Gallagher (ann.gallagher@fcc.gov)

bcc (public file copy): John Proffit
Alex Schneider

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the analog and HD-1 signals, by programming classical music while the analog and HD-1 signals provide news programming, and news when the analog and HD-1 channels broadcast music.

Typical current broadcast schedule:

| | 5 am – 12 pm | 12 pm – 4 pm | 4 pm – 8 pm | 9 pm – 5 am |
|---------------|--------------|--------------|-------------|--------------|
| Analog | <u>News</u> | <u>Music</u> | <u>News</u> | <u>Music</u> |
| HD-1 | <u>News</u> | <u>Music</u> | <u>News</u> | <u>Music</u> |
| HD-2 | Music | News | Music | News |

Underlines represent simulcast of analog signal

Thus, the Station currently simulcasts its analog dual format programming on HD-1. While this current set-up provides 24 hours per day of both news programming and classical music programming available amongst the multiple streams, listeners who prefer one of those formats exclusively must switch between the Station's two HD channels throughout the day.

Accordingly, the University requests Experimental Authorization to permit it to continue to broadcast its analog signal's dual format news/music programming, but to change its HD-1 stream to an all-news format and its HD-2 stream to an all-classical music format. As a result, the Station's combined digital signals would continue to simulcast the analog signal's programming at all times throughout the day, either on HD-1 or HD-2, although neither digital channel alone would simulcast the analog programming for a consecutive 24 hour period. As a result, digital radio listeners would have their choice of (1) the Station's traditional analog dual format programming, (2) a digital channel that offers an all-news format 24 hours per day, or (3) a digital channel that offers an all-classical music format 24 hours per day.

Typical proposed broadcast schedule:

| | 5 am – 12 pm | 12 pm – 4 pm | 4 pm – 8 pm | 9 pm – 5 am |
|---------------|--------------|--------------|-------------|--------------|
| Analog | <u>News</u> | <u>Music</u> | <u>News</u> | <u>Music</u> |
| HD-1 | <u>News</u> | News | <u>News</u> | News |
| HD-2 | Music | <u>Music</u> | Music | <u>Music</u> |

Underlines represent simulcast of analog signal

From a technical standpoint, the University submits that the hybrid transmission standards can be achieved without a strict duplication of analog programming by a given digital signal, as the change can be accomplished by plugging a different signal source into the HD-1 encoder. Through the proposed experimental operation, the University plans to determine