

December 9, 2009

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

ATTN: Media Bureau, Audio Division
Digital Radio

NOTE: Exempt from filing fees

Re: **Request for Extension of Experimental Authorization
for Operation at Increased Digital Radio Power Levels**

University of Houston System
Station KUHF(FM), Channel 204, Houston, TX
Facility ID No. 69150 / FRN: 0006677827

Dear Ms. Dortch:

On behalf of the University of Houston System (the "University"), licensee of noncommercial educational radio station KUHF(FM), Houston, Texas, and pursuant to Section 73.1510 of the Commission's Rules, we respectfully request an initial six-month extension of its experimental authorization to conduct tests of the HD radio system at digital power levels of up to 10 dB above the currently permitted value of -20 dBc relative to analog power.

The University filed its initial request for experimental authorization to test the HD radio system operation at increased digital power levels on June 18, 2009, in FCC File No. 20090618AEA. That request was granted by the Commission on July 15, 2009, with an expiration date of January 15, 2010. The University now requests a six-month extension, through July 15, 2010.

As the original application explained, the request for operation at increased digital power levels was filed in conjunction with the plans of HD radio system developer iBiquity digital Corporation and National Public Radio for a study to determine the effects on digital coverage and possible interference with analog FM broadcasting. The testing was also intended to compare digital reception availability in buildings for fixed and portable receivers, as well as with mobile receivers. Following its commencement of HD broadcasting in 2006, Station KUHF has placed more than 2,000 table-top and component HD radios with its members, thus providing an extensive database of potential test participants for the NPR study.

FILED/ACCEPTED

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Office of the Secretary

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As required in connection with this extension request, enclosed is a copy of NPR's "Report to the FCC" detailing the test procedures and technical findings for the experimental operation. In addition, KUHF reports that following the commencement of the experimental operation, it has not received any listener complaints concerning in-house reception problems; previously, the station received numerous such complaints to which it was only able to respond with recommendations concerning the use of different antennas or the relocation of HD radio receivers within buildings. Moreover, prior to the commencement of the higher HD power experimental operation, KUHF had received other reports of HD radio reception problems – specifically the heavily developed suburbs north of Houston – where poor HD signal penetration adversely affected virtually all reception situations and listeners informed KUHF that they were "giving up on HD." As a result of the testing, preliminary recommendations from NPR include a permanent power increase for HD operation and continued testing of methods to transmit higher power without interference to other broadcasters.

The University requests an extension for continued experimental authorization employing KUHF's licensed auxiliary antenna at 450 meters above ground, located at the same site and on the same tower as the station's analog FM antenna. The operation complies with the Commission's Public Notice in MM Docket No. 99-325, released March 17, 2004. Continued testing will be conducted on a non-interfering basis with any first adjacent channel stations and in compliance with the NRSC-5A Standard and the current FM HD radio emission mask. Technical questions may be directed to KUHF's engineer Alex Schneider, at telephone number (713) 743-1825, or email aschneider@kuhf.org.

The University is governmental entity and a noncommercial educational licensee, and operates KUHF on a noncommercial educational basis. 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.

Respectfully submitted,



Barry S. Persh
Counsel for the University

Enclosure

cc: Ann Gallagher, FCC
John Kean, NPR (w/o encl.)