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MEDIA BUREAU
AUDIO DIVISION
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Laura M. Berman, Senior Counsel
Entercom License, LLC
2400 Market Street, 4th Floor
Philadelphia, PA 19103

Re: Station WIP-FM, Philadelphia, PA
Entercom License, LLC
Facility ID No. 28628
File No. 20210205AAE

Request for Experimental Authority

Dear Ms. Berman:

This letter is in reference to the request filed February 5, 2021, on behalf of the Entercom License, LLC (Entercom), licensee of commercial FM station WIP-FM, Philadelphia, Pennsylvania,¹ for an experimental authorization to operate the station's main facility with a digital effective radiated power (ERP) increase to levels as high as 4 dB above the currently permitted digital power level of -14 dBc.² Entercom's original request was filed on February 21, 2020.³ On June 10, 2020, Entercom notified the Commission that it was unable to complete the authorized tests because of the COVID-19 pandemic. Entercom is now ready to resume testing and requests an experimental authorization be effective for a period of 90 days with a new commencement date of February 22, 2021.

¹ File Number BLH-20070529ADN. WIP-FM is licensed to operate on channel 231B (94.1 Megahertz) using a nondirectional antenna, maximum 9.6 kilowatts (kW) effective radiated power (ERP), and 338 meters antenna radiation center height above average terrain (HAAT).

² Decibels relative to the analog carrier

³ File number 20200225ACX, granted 3/6/2020, expired 6/4/2020

Entercom requests authority to commence a test program to assess the actual level of interference experienced by first adjacent channel stations in the presence of an increased digital power increase of up to -10 dBc. Entercom states that the proposed test will be conducted in conjunction with the National Association of Broadcasters (NAB) and HD Radio system developer, Xperi Corporation to collect information valuable for future In-Band-On-Channel (IBOC) digital radio service. Entercom also states that the digital power increase is anticipated to be brief and between midnight and 5 AM. There will be no change made to the current antenna system. Finally, Entercom states that the digital power increase will be immediately discontinued in the event of interference complaints received from co- or adjacent channel stations if such complaints are not satisfactorily resolved.

Our review indicates that the proposed experimental operation meets the requirements for experimental operations set forth in Section 5.203.⁴ We note that by increasing WIP-FM's digital ERP to -10 dBc, the proposal fails to meet the contour nonoverlap requirements⁵ of the Media Bureau's Order, adopted January 27, 2010, in Mass Media Docket No. 99-325⁶ with the following first-adjacent stations: (1) WNYC-FM, New York, NY, New York Public Radio; (2) WIBG-FM, Avalon, NJ, WIBG, LLC; and (3) WJLK(FM), Asbury Park, NJ, Townsquare Media Monmouth-Ocean License LLC. However, the NAB has indicated that these stations have been notified of the test plan, and the digital power increase would only occur between midnight and 4 am.⁷ Therefore, we find that public interest would be served by the knowledge gained through testing of interference level in the presence of an overlap. Accordingly, the request IS HEREBY GRANTED. WIP-FM may operate with maximum digital ERP as follows:

Analog ERP:	9.6 kilowatts (kW), H&V ⁸
Digital ERP:	0.96 kW
Hours of Operation:	12 am to 5 am

⁴ 47 C.F.R. § 5.203

⁵ The predicted 49.5 dBu F(50, 10) interfering contour will overlap with the 60 dBu F(50,50) protected contour of the nearby first adjacent stations

⁶ See *Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service*, Order, 25 FCC Red 1182 (MB 2010).

⁷ Email dated March 4, 2020 from David Layer to James Bradshaw

⁸ All ERP values rounded in accordance with 47 CFR § 73.212(a).

This authority is specifically conditioned on the lack of objectionable interference. Operation under this authority shall be terminated if complaints of interference to other FM stations are received. Entercom shall employ whatever means are necessary to prevent excessive exposure of workers or the public to radio frequency radiation, pursuant to Section 1.1310 of the Commission's Rules.⁹ Within 60 days following completion of the experimental operation authorized herein, Entercom shall file a full report detailing the research, experimentation and results of the testing with the Commission, pursuant to Section 5.203(d) of the Commission's Rules.¹⁰ 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 detailing the progress of the experimental operation as of the filing date of the request.

This experimental authority expires on May 23, 2021.

Sincerely,

James D. Bradshaw
Senior Deputy Chief
Audio Division
Media Bureau

cc: David Layer, NAB (via email)
Glynn Walden, Entercom (via email)
Steve Shultis, NYPR (via email)
Russ Mundschenk, Xperi Corporation (via email)

⁹ 47 C.F.R. § 1.1310.

¹⁰ 47 C.F.R. § 5.203.