

Before the  
**Federal Communications Commission**  
Washington DC 20554

In the Matter of	)	
	)	
Promoting Spectrum Access for Wireless	)	Docket No. 14-166
Microphone Operations	)	
	)	
Amendment of Part 15 of the Commission's	)	
Rules for Unlicensed Operations in the	)	
Television Bands, Repurposed 600 MHz Band,	)	
600 MHz Guard Bands and Duplex Gap, and	)	Docket No. 14-165
Channel 37	)	
	)	
Amendment of Part 74 of the Commission's	)	
Rules for Low Power Auxiliary Stations in the	)	
Repurposed 600 MHz Band and 600 MHz	)	
Duplex Gap	)	
	)	
Expanding the Economic and Innovation	)	Docket No. 12-268
Opportunities of Spectrum Through	)	
Incentive Auctions	)	

**COMMENTS OF CP COMMUNICATIONS, LLC**

CP Communications, LLC ("CP Communications"), hereby submits these Comments on the Further Notice of Proposed Rulemaking ("FNPRM") issued in the above captioned proceedings.<sup>1</sup> CP Communications acknowledges and appreciates the Commission's actions in revising its rule to replace the spurious emission limits that were adopted with the ETSI spurious emission limits for licensed and unlicensed wireless microphones and the other technical clarifications and the importance of these changes to the industry. CP Communications also

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<sup>1</sup> *Promoting Spectrum Access for Wireless Microphone Operations; Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 60 MHz Guard Bands and Duplex Gap, and Channel 37; Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 60 MHz Duplex Gap; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Order on Reconsideration and Further Notice of Proposed Rulemaking, 2017 WL 3000810 (F.C.C.) (2017) ("FNPRM").

believes that a 50 microphone threshold for licensing protection is unduly restrictive and supports all Commission attempts to provide professional entertainment and productions organizations interference protection.

CP Communications has a significant stake in the rules adopted in this proceeding, because it is a leading source for the rental of wireless production equipment that is subject to those rules -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing. CP Communications' customers include the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. CP Communications owns and operates wireless microphones in the 600 MHz band and holds licenses for wireless microphones under Part 74 of the FCC's Rules. The Company's business is highly specialized, requiring hardware and skills that lead most high-level professional users to contract with outside vendors. Only a handful of companies offer these services, but their services are critical to the activities of their customers. They are called upon to configure and operate the most complex systems -- those beyond the expertise of even broadcast customers -- and are on the "front lines" when it comes to finding and efficiently using spectrum and applying the Commission's Rules in actual practice.

In other words, CP Communications has a very strong stake in how the Commission deals with wireless microphones, because it is the entity that has to solve the problem of finding enough frequencies and developing the operations for the microphone configurations that its customers demand. As such, CP Communications appreciates and supports the Commission's recognition of the importance of wireless microphone operations by clarifying and revising the technical requirements previously adopted.

CP Communications also supports professional performing arts and other professional entertainment and production organizations in need of protection. Such organizations serve the public interest by providing the arts to the public. They utilize high-quality audio during events and the equipment uses relatively low power over short ranges. As such the prospect of causing harmful interference is low. Also, such users have high performance requirements, for example, stage performers must have audio quality as good as a live voice and very low latency (<3 ms). These are the types of necessary considerations that mandates interference protections for such users. A 50 microphone threshold is an arbitrary limitation placed on an important group of users. Support for the arts and organizations which provide them is paramount to the public interest.

For these reasons, CP Communications supports providing a process through which such organizations can become licensees with interference protection and also providing access to other spectrum bands as eligible licensees.

Respectfully submitted,



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