



October 11, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch:

On behalf of Pittsburgh Public Theater, located in Pittsburgh, PA, which provides 230+ performances per year to approximately 80,000 audience members and education/outreach programs serving 10,000+ individuals, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The mission of Pittsburgh Public Theater is to provide artistically diverse theatrical experiences of the highest quality. Pittsburgh Public Theater also strives to serve, challenge, stimulate, and entertain while operating in a fiscally responsible manner. The Public shares its resources with the community through education and outreach initiatives intended for a wide range of people with the goal of expanding and diversifying the audience while enriching the community.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. I support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group. Professional performing arts organizations hold tens of thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our industry.



Pittsburgh Public Theater owns 20 wireless microphones and four channels of wireless communications headsets. In addition to these, the company often rents extra wireless microphones to accommodate its larger theatrical productions. Although the Public does not use wireless microphones for every performance, microphones are used for roughly 80-120 performances per year. However, wireless communications headsets must be used in every one of the Public's 230+ performances each year to ensure that productions go according to plan and are executed safely.

When the FCC made the ruling on the 700 MHz band, Pittsburgh Public Theater, a not-for-profit theater company, had to spend over \$30,000 to replace wireless systems that utilized this frequency band; the company expected the new systems would be useable for at least 15 years. The Public's wireless microphones and communications headsets are capable of changing frequencies, but each device is limited to a specific band in both the Low UHF and High UHF spectrum. Should more frequency bands be removed from the Theater's use, the company can expect to pay upwards of \$20,000 to re-tune existing devices, but this number could be much larger if wireless microphone manufacturers decide to stop supporting their older models to make way for newer ones.

I urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- a mission statement of providing performing arts to the public;
- a history of professional-quality wireless audio presentations to audiences without interference;
- technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- a commitment to register for protection only the frequencies, times, and locations actually needed; and
- a practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Please consider the burden that Pittsburgh Public Theater, and other not-for-profit arts organizations like it, have already borne by vacating the 700 MHz band. Performing arts organizations provide demonstrable service to the public by improving quality of life; creating and preserving cultural heritage; providing education, enlightenment, and entertainment; and stimulating the economy. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones.

I appreciate that the Commission has sought Public Comment on this very important issue. Thank you for your consideration.

Sincerely,



Monica Bowin
Director of Production & Operations
Pittsburgh Public Theater

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