

# ST. ANN'S WAREHOUSE

45 Water Street | Brooklyn, NY 11201 | 718 834 8794 | stannswarehouse.org

Oct. 10, 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 St. Ann's Warehouse, located in Brooklyn, NY, that provides approximately 200 performances per year to audience members, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. For over 35 years, St. Ann's Warehouse, Inc. has commissioned, produced, and presented a unique and eclectic body of innovative theater and concert presentations that meet at the intersection of theater and rock and roll. Since 2000, the organization has helped vitalize the Brooklyn Waterfront in DUMBO, where St. Ann's has become one of New York City's most important and compelling live performance destinations. Through its signature multi-artist concerts and ground-breaking music and theater collaborations, St. Ann's continues to celebrate the panoramic traditions of American and world cultures, with forays into a variety of contemporary forms, including new commissions and multi-disciplinary theatrical presentations.

We 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. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold 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 sector. As a professional performing arts organization, our productions rely heavily on a stable system of wireless microphones, IEMs, and wireless communications. St. Ann's Warehouse is equipped with Clear-Com WBS-680 wireless communications base stations with Clear-Com WTR-680 wireless belt packs, and 2-way Motorola radios, and we rent wireless microphone and IEM systems based on the needs of the productions. Sennheiser 3732 receivers, or Sennheiser 3532 with Sennheiser Sk5212 transmitters, and Shure UR4D receivers with Shure UR1M transmitters are among the most commonly used wireless microphone packages. Our systems tend to use UHF bands ranging between 403MHz-470MHz for our 2-way radios, and 500Mhz-700MHz for wireless microphones, and wireless communications. On average, 10-20 wireless channels might be used on a given performance. Even though each unit can be tuned within the units' given frequency ranges it's imperative that we are able to maintain a set of frequencies that are protected and stable. While the wireless system is a necessity to the performances, it is also crucial for safety measures behind the scenes. Having a reliable wireless communication system backstage helps to ensure the physical safety of all performers, crew, and audience.

I would 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.

As the Sound and Video Supervisor at St. Ann's Warehouse, achieving a stable wireless system is a constant concern. Professional performing arts organizations such as ours should have access to reliably available spectrum with interference protection. As we have already lost the 700 MHz band, the potential loss of more bands presents a concern for future and stable available frequency bands. Our organization, as well as all performing arts organizations, provides a meaningful and important service to the public. Our services contribute to the enrichment of the human experience by preserving culture, provoking thought, providing education, enlightenment, and entertainment. We are integral to our communities, and we contribute to our local economies across the country. I fully support and endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and education institutions that use fewer than 50 wireless microphones. The proposal is much-needed and will benefit our arts community, organizations that operate under smaller budgets who are more susceptible to unregulated and unprotected wireless infrastructure, and the public.

Sincerely,  
Joseph M. Castillo (Joemca)  
Sound and Video Supervisor - St. Ann's Warehouse

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