

PAPER MILL PLAYHOUSE

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 Paper Mill Playhouse in Millburn, NJ, a not-for-profit theater that provides approximately 200 performances per year to 200,000+ audience members and education programs to 35,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Paper Mill Playhouse is one of the country’s oldest and most respected regional theaters with a national reputation for producing classic musical theater, nurturing new work and new artists and serving the community with transformative education and access programs. We produce a season of mainstage productions that runs from September through June and offer a wide array of award-winning education programs that impact students statewide. In recognition of its work, Paper Mill received the 2016 Regional Theatre Tony Award.

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.

Paper Mill uses between 20 to 36 of the following wireless equipment during its performances: microphones, in-ear communications (IFBs), cue and control devices and equipment controlling devices. In a calendar year we produce close to 200 mainstage performances and 30-40 Children’s Theater performances and other student events.

We use all bands: VHF 75 MHz; low UHF – all channels; high UHF—all channels. Specifically, VHF channels (2-13, 54 MHz to 216 MHz); Low UHF channels (14-36, 470 to 608 MHz) and High UHF channels (38-51, the 600 MHz band, 614 MHz to 698 MHz). None of our devices are outside the TV bands.

Our microphones are able to tune to more than one frequency and their tuning ability is 24MHz wide. All of our devices are analog; we own our wireless equipment, but rent additional equipment when needed. We expect our microphones to last another five years, but anticipate that all other wireless equipment will need to be replaced within two years.

When we moved out of the 700 MHz band we retuned 6 microphones into 690-698 which took a month at significant union labor rates, and replaced equipment at a cost of approximately \$1,000.

Sound at Paper Mill is supervised by our head Sound Engineer who has a BFA in theater, 15 years as a professional Sound Engineer and user of wireless microphones. He is a member of IATSE local 21, and a former member of USITT.

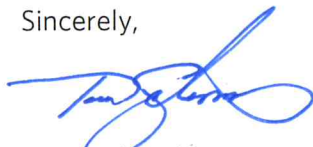
I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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.

On behalf of the Paper Mill Playhouse Board, staff and stage crew, as well as the 250,000 theater-lovers, students, teachers and families who rely on this theater to provide the highest quality arts and education programming, I appreciate the opportunity to provide the Commission with feedback on this issue. Having access to reliably available spectrum with interference protection is essential to our industry and the need to replace sound equipment because of continually changing band access is especially burdensome to the many not-for-profit arts organizations that provide a crucial public service. Paper Mill Playhouse has \$25 million of economic impact in the state of New Jersey (*Arts & Economic Prosperity IV Calculator*). This represents a small fraction of the economic impact attributable to the work of performing arts organizations across the country.

I 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. It is a solution that benefits the arts community and the public.

Sincerely,



Todd Schmidt
Managing Director