



**Friday, October 6, 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 **Fort Worth Country Day School**, located in Fort Worth, TX, that provides approximately **60** performances per year to **5,000** audience members and education programs to **1200** students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Our mission in the Fort Worth Country Day Arts Department is to energize, educate, nurture and support his or her passion for the arts each and every day! From kindergarten through senior year, FWCD students are given the opportunity to engage with dedicated faculty artists who strive to challenge and motivate students in their artistic pursuits. From the ceramics studio to the photo lab, from the ballet studio to the Scott Theater, from the band hall to the orchestral stage, our students explore their artistic imaginations and goals, tackle the challenges of multiple art forms and artistic concepts, and connect with their teachers and to the world outside of our campus through these exciting cultural experiences.

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

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

At FWCD we use several wireless sound products. We operate 32 channels of RF for microphones, and about 5 channels of RF for wireless headsets. All of these are used in at least 4 programs a year at our school. We use a smaller number of these devices on a daily basis as our theater servers all three levels of school (lower school, middle school, and upper school). We have at least 3 events per week if not more that use our wireless system. We currently operate Low UHF wireless devices. As budget allows we are trying to keep up with the changing demands of the FCC. This is quickly becoming difficult to do. We



currently operate no digital receivers as they are cost prohibitive for us. We have a limited single channel/frequency range on our current channels of RF as we use the Shure ULX-1 model. We also do not currently have an audio person on staff. We do however have access to some of the finest audio companies and their staffs in Texas through the connection of our Theater Manager.

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.

I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. I am thankful that the FCC has reached out for Public Comment on this issue. I would urge the committee to remember the burden already put on the arts community by vacating the 700 MHz band. That was one blow to our budgets and I don't know if we can sustain a second. Help us protect our investments by approving this proposal.

Sincerely,

Eric Lee Tysinger  
Scott Theater Manager  
Fort Worth Country Day School