



10.11.2017

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 Swift Creek Middle School, located in Midlothian, VA that provides approximately eight performances per year to over a thousand audience members and education programs to 900 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

We envision that Swift Creek Middle School will be a thriving, dynamic and inspiring educational environment that produces self-directed learners with 21st-century skills and stimulates citizens of all ages to trust in, invest in and benefit from public education through the arts. The performing arts allows students to express themselves in a myriad of ways to become the best versions of themselves.

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.

- We use wireless devices such as:
 - microphones
 - cue and control devices
 - equipment controlling devices (not transmitting sound)
- We use about 15 units in a typical presentation or performance.
- We offer at least 20 presentations that use wireless devices?
- We use these brands:
 - VHF (channels 2–13, 54 MHz to 216 MHz)

- High UHF (channels 38–51, the 600 MHz band, 614 MHz to 698 MHz)
- Our microphones are able to tune to more than one frequency

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.

School theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21st century skills, such as creativity and collaboration. They also contribute to local economies in every community across this country. 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. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies. Please understand that the theater is not only used for student productions. There are many meetings, concerts, churches and other uses for wireless devices in our schools.

Sincerely,

Caitlan L. Phelps

Theatre Teacher and Director
Swift Creek Middle School