



Our Mission is to provide a Catholic education that fosters spiritually, morally, academically and technologically prepared lifelong learners.

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 St. Francis Borgia Regional High School, located in Washington, Missouri, that provides approximately 25 performances per year to 2000 audience members and education programs to 550 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Our theater program's mission is to provide students with an opportunity to participate in the arts as performance artists and/or technical artists and to bring the arts to our local 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. 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 St. Francis Borgia Regional High School we use ten to twenty head-worn wireless microphones for stage performances, and we have ten handheld wireless microphones. We also use other wireless devices such as wireless DMX and wireless stage-to-control booth communication devices. We hold public performances of six different productions over the course of the year, which means we have public viewings of plays or musicals every month and a half. We also have weekly class meetings that require wireless microphones and monthly club meetings. Add to that the many times throughout the year the public uses our theater space and sound system for other events (dance recitals, band concerts, choir concerts, and you begin to see that we use the wireless systems at least once a week.

We own ten Audio-Tehnica microphone systems that are in the 600MHz range, ten hand-held microphones that fall in that same range, and various other wireless systems, all of which were purchased after the 700MHz range was snatched out from beneath us, costing us almost \$10000 to replace our equipment. Our current microphones are unable to tune to any other frequencies and thus we are once again stuck with equipment that will be as valuable as door stop wedges in the next few months and we will

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once again be out \$10000 or more to replace our equipment, or we'll be forced to perform without sufficient audio reinforcement.

As a trained and experienced audio technician who also works in the theme park industry, it is my belief that this latest frequency-grab will significantly harm public performances due to the lack of funds that it would take to replace this equipment. Schools and theme parks may drop public performances completely rather than replace the equipment, citing lack of funds as the determining factor.

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.

Let me ask you this: what if you recently bought a shiny new Chevrolet? You probably figure that this new Chevrolet should get you where you need to go and provide you a certain amount of convenience and practicality for the next ten to twenty years. Then the government suddenly stepped in and said, "Sorry, Chevrolets are taking up too much road space, space that we need for big rig trucks and lumber-haulers. Therefore you may no longer drive your Chevrolet. And, by the way, if you were lucky enough to buy the right model of Chevrolet, you might get up to 5% of the worth of your car to buy another new car that's not a Chevrolet. If you bought the wrong model, you'll get nothing and you'll just have to deal with it." You are telling my students and my community that the money that they spent on equipment that is necessary to perform important tasks is unimportant. And I'm telling you that the very students and community members that you are alienating are the students and community members that are in the most need of something to hold onto and call their own. Don't take this away from them.

Sincerely,  
Tim Buchheit, Director  
Department of Theater and Speech  
St. Francis Borgia Regional High School