



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 Apex High School, located in Cary, North Carolina, that provides approximately twenty performances per year to 3,500 audience members and education programs to five hundred students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The mission of Apex High School's Theatre Program is to train students to be active and involved global citizens by preparing them to work collaboratively and creatively in a professional theatre environment. In order to provide this high caliber of training, it is necessary that we have access to professional wireless capacity for the use of our microphones and backstage communication devices. Due in part to our ability to access professional equipment, graduates of Apex High School have been employed in regional and professional theatres around the country. This would not be possible without their ability to practice with the type of equipment that they would be using in the future.

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.

In a typical performance of our spring musical, we use between 16 and 24 wireless microphones, as well as four to six wireless communication devices distributed among our stage management team and lighting and sound board operators. Outside of the musical, we use wireless devices multiple times each month for band concerts, chorus concerts, string concerts, club presentations, and college admissions counselling, to name a few. Throughout the past fifteen years, we have collected a total of sixteen wireless microphones, and we could not afford to replace this equipment. Without it, we would not be able to present our spring musical, which features over one hundred students on and off stage, and which is well-loved by our community. There is no way to broadcast music and vocals to our eight-hundred seat theatre without the use of our wireless devices. Additionally, we do not employ an audio technician, and therefore to replace and reset our microphones would require time, experience, and money that would take away from time spent on other preparations for our productions. Ultimately this would negatively impact hundreds of students and members of the community.

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 appreciate that the Commission has sought Public Comment on this very important issue. Educational institutions and professional performing arts organizations should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. The performing arts are a vital part of our school and community, and with all the challenges we already face in gaining support for the arts in public schools, I believe it is absolutely necessary that we protect the rights and access we currently have, so that we can continue to provide high quality performances that help us to advocate for our programs and the necessity of the arts in our community, state, and world.

Besides education, school theatre programs affirm 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.

Sincerely,

Laura Levine
Theatre Teacher and Director
Apex High School