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October 12, 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 Arvada Center for the Arts and Humanities, located in Arvada, Colorado, that provides hundreds of performances per year and education programs to thousands of students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

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.

The Arvada Center owns and regularly uses over 66 channels of wireless devices in its presentation of professional theater, professional musicals, banquets, educational programming for children and adults, as well as live concerts for local and national acts, accessibility for the handicapped, and more. This figure includes 54 wireless microphones owned by the Arvada Center itself in three disparate frequency-agile ranges of 470 through 530 MHz (G1 band), 554 through 590 MHz (J1 band), and 638 through 698 MHz (L3 band). We often use forty or more channels of wireless microphones and communication for a given production, and frequently have up to four productions operating simultaneously, all using wireless microphones and other similar wireless transmission devices.



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In addition to wireless microphones, we employ many other analog wireless devices. We have three assisted listening systems operating in the VHF spectrum for hearing impaired patrons. Behind the scenes, many personnel use twelve additional channels of low and high UHF spectra for wireless radios and intercom systems to coordinate education programs, facilitate performances, and for the coordination of public safety.

In 2010 when the 700 MHz band was rendered illegal for use by performing arts institutions, we were forced to abandon 42 channels of wireless microphones and buy replacements at a cost of \$58,046.38, not including associated labor expenses, which were also considerable. As such, we fear the financial burden of having to again purchase new equipment either to deal with the potential dearth of interference protections provided to smaller organizations or to vacate future frequency bands reallocated by the FCC. Government programs/policy that would minimize expenses to replace equipment or allow the use of frequencies until the end of a product's life could potentially reduce this burden.

We appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions 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. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. 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 performing arts organizations and educational institutions 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,

Philip C. Sneed
Executive Director
Arvada Center for the Arts and Humanities