



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 the Huntington theatre Co, located in Boston, Massachusetts, that provides approximately 280 performances in 2 locations per year to 130,000 audience members and education programs to 33,000 students. We also support numerous community and outside groups with rental of the facilities, opening the range of audiences our facilities serve considerably. I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. These devices are an important tool in our efforts to reach our audiences and our community.

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 Huntington Theatre owns 26 channels of wireless microphones that we use for dialogue and music reinforcement in our shows. We also own 6 channels of wireless in-ear monitors which we use extensively to create wireless speakers for special on stage effects, such as practical radios on moving scenery, a piano that can be played from the orchestra pit while an actor appears to be playing it, and many other such applications. We also use wireless systems for both assisted listening systems for hearing impaired patrons and for audio description for blind or visually impaired patrons. We use wireless technologies for transmitting MIDI control data as well as wireless dimming systems for lighting control.

From the audio standpoint, we typically have from 6-20 wireless microphones active in any given production, depending on the cast size. The use of wireless microphones is not only beneficial to the audience in terms of audibility, but it allows the artists onstage more freedom from the traditional oratorical style of theatre, giving a greater sense of reality to our performances.

Our ADA systems run at 72 mHz. Our wireless microphones, and in-ear monitors, are all in the UHF range. We are in the process of purchasing replacements for 12 channels that are in the 600 mHz range, and it's only been a few years since we purchased some of that equipment as replacement for our older 700 mHz equipment. All of our equipment is frequency adjustable, and we currently run frequency scans at the beginning of each production to co-ordinate our wireless frequencies with other signal in the area, along with constant monitoring of the frequency spectrum.

The transition out of the 700 mHz range cost us about \$50,000. Part of that was spent in getting our intercom systems up to the 900 mHz range hoping that we would be protected from at least some of the future auction activity. While the newer equipment we have been looking at is smarter, and better able to minimize its share of the frequency bandwidth, we worry how long it will be before we're expected to replace this equipment.

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 issue that is so central to our mission. 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. Over the last 20 years that I've had this position, I've seen the neighborhood become increasingly active. This is a neighborhood with several arts organizations, and it has been clear that the audiences we bring in add vibrancy and life. New restaurants have opened, new shops, and more people are taking advantage of the amenities that have grown in no small part due to the art and culture found here. I ask that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. Once we have invested further in vacating the 600 mHz band, having the ability to co-exist with other users in this shrinking frequency bandwidth is going to take every tool we can use, and licensing could be an important part of that toolset.

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,

Ben Emerson  
Sound Supervisor  
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