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## MANHATTAN THEATRE CLUB

October 13, 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,

I am writing to you on behalf Manhattan Theatre Club, one of the country's most acclaimed non-profit theatre organizations, with a focus on developing and producing new work both on and Off-Broadway. MTC produces eight plays and musicals each year. Last season alone, we produced 615 performances attended by 247,309 people. I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

MTC's mission is to

- produce a season of innovative work with a series of productions as broad and diverse as New York itself;
- encourage significant new work by creating an environment in which writers and theatre artists are supported by the finest professionals producing theatre today;
- nurture new talent in playwriting, musical composition, directing, acting and design; and
- to reach out to young audiences with innovative programs in education and maintain a commitment to cultivating the next generation of theatre professionals.

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.

MTC produces shows that use wireless devices regularly. We use approximately 4-25 wireless devices in a typical performance, including wireless microphones, wireless in-ear communications (IFBs), wireless cue and control devices, and wireless equipment controlling devices. Our devices use VHF, low UHF, and high VHF channels. Our wireless microphones use 42MHz and are able to tune to more than one frequency. MTC owns some wireless equipment and rents additional equipment as needed. The equipment that we own has a reasonable life expectancy

of approximately eight years. When we moved out of the 700 MHz band, we had to replace four wireless handheld microphones at a cost of approximately \$3,000. MTC employs audio technicians as full-time seasonal staff. Our technicians are all members of the IATSE Local One stagehands union, and have been trained through IATSE courses and/or through apprenticeships and on the job experience.

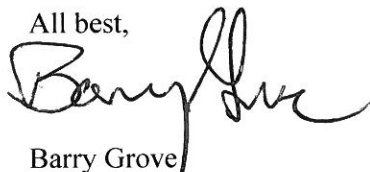
I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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.

We appreciate that the Commission has sought public comment on this critical issue. Without access to a reliable spectrum that provides protection from interference, our performances risk being less than professional. Sound equipment is expensive. If purchasing new equipment is an outcome, will the FCC be able to provide assurance that the new system will work properly without interference?

In *The Social Well-Being of New York City's Neighborhoods*, a recent study commissioned by New York City Department of Cultural Affairs and led by Mark J. Stern and Susan Seifert of the University of Pennsylvania, stated that, "across the board, cultural participation correlates with improved health, personal security and school effectiveness," leading to "greater measurable impact in social well-being." Professional wireless capability is essential to the theatre community's ability to continue supporting social well-being in New York City and beyond. For this reason, we respectfully endorse the Commission's proposal to expand Part 74 LPAS rules that will accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones.

All best,

A handwritten signature in black ink, appearing to read "Barry Grove", written in a cursive style.

Barry Grove  
Executive Producer