

GOODMAN THEATRE

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ROBERT FALLS, ARTISTIC DIRECTOR ROCHE SCHULFER, EXECUTIVE DIRECTOR

October 9, 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 Chicago's Goodman Theatre, which provides approximately 400 performances per year to a quarter million adults, seniors and teens, we write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Goodman Theatre seeks to be the premier cultural institution in Chicago through the unsurpassed quality, range and diversity of its productions and programs and its commitment to improving the quality of life in the community. Wireless microphones and backstage communications devices play an important role in this mission, allowing us to coordinate complicated technical components of our productions and ensure that all patrons—including those with hearing disabilities—are able to experience the work on stage as well as possible.

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.

Wireless devices are important tools in our own business, with 20-40 units being used at a time across 40-60 unique events and productions, spanning more than 400 performances per year. The Goodman's analog devices include microphones, IFB in-ear communications devices, wireless speakers and assisted listening devices for patrons with disabilities as well as while digital equipment includes cue and control devices (for sound, lights, special effects and automation), wireless dimming devices (for lights) and headsets which coordinate all activity both on and off the stage. Together, these devices span a range of bands and channels, including:

- VHF (channels 2–13, 54 MHz to 216 MHz)
- Low UHF (channels 14–36, 470 to 608 MHz)
- High UHF (channels 38–51, the 600 MHz band, 614 MHz to 698 MHz)
- And bands 1.9Ghz, 2.5Ghz, which are used for all of the above-described digital devices including cue and control devices, wireless headsets and wireless dimming.

All of the Goodman's analog microphones tune to more than one frequency, with a range of 75 Mghz.

Together, these resources represent a significant investment. As a non-profit, the Goodman operates with a small financial margin, creating significant pressure to maximize the utility of every purchase it makes. The theater's current inventory is a combination of owned and rented equipment, but all purchases are expected to last 10-15 years. When the agency's rules changed only seven years ago, the theater spent \$40,000 replacing equipment to cease operations in the 700 MHz band in compliance with the new guidelines, reflecting significant research, several working days of installation and more than 10% of that year's capital maintenance budget.

With this in mind, we 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.

Goodman Theatre is a major non-profit business with a workforce of nearly 200, including a significant portion of technicians represented by the International Alliance of Theatrical Stage Employees (IATSE), and an audio head with over 30 years of experience. The proposed certifications are well within the scope of our professional expertise, as they are for our peers, and would have a profound impact on our continued ability to serve the public. Whether ensuring the safety of our performers and technicians through

coordination of lights, sound and special effects, or that our productions are fully available to patrons with all levels of hearing, wireless technology is an important part of our operations. Reliable access and protection from interference are key components in creating an environment in which our small business can thrive.

More broadly, 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; in Chicago alone, the nonprofit arts alone are a \$2.2 billion industry that supports over 60,000 full-time-equivalent jobs, generates a total of \$1.3 billion in household income to local residents, and delivers more than \$200 million in local and state government revenue. Every one of these businesses wrestles with telecommunications issues and many of us are dependent upon access to wireless frequencies.

We appreciate that the Commission has sought Public Comment on this very important issue. The cost already borne by the performing arts community in vacating the 700 MHz band was considerable and we are concerned about the cost of once again replacing our sound equipment at barely half of its life expectancy. On behalf of our thousands of private supporters who make our operation possible, we would like some assurance that the system will work properly and without interference moving forward.

With this in mind, we 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. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roche Schulfer', with a stylized, wavy line for the last name.

Roche Schulfer
Executive Director

A handwritten signature in black ink, appearing to read 'Scott Conn', with a long, sweeping horizontal line extending to the right.

Scott Conn
Production Manager