



Date: 10/12/17

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 Signature Symphony at TCC, located in Tulsa, Oklahoma, that provides approximately 10 performances per year to 5,000 audience members and education programs to students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. We are a professional orchestra on a college campus with a strong educational outreach.

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.

We have five performances of classical works and seven performances of pops. We use hand held and lavalier type microphones. Because of the last FCC ruling we have had to buy at considerable expense sixteen new microphones. We also use in ear communication for hard of hearing audience members. We have ten cue devices made by Clearcom. We typically use between three and ten wireless microphones depending on the show requirements. The auditorium in use also services the Theater department, Music department, and various rental clients whose needs sometimes exceeds our own.

The following is a list of equipment which we now use:

- 6 Shure QLXD models with frequency ranging from 470–543MHz,
- 10 Shure UR4D models with frequency ranges from 470–530 MHz,
- 2 Shure UA845-SWB antenna combiners with frequency range from 470–952 MHz,
- 1 Shure UA844+SWB antenna combiner with frequency from 470–952MHz,
- 1 Sennheiser EW100-G2 wireless unit with frequency range of 518–584 MHz,

Our hearing impaired system is at 72 MHz.

It is important to note that it took five years by buying mics a few mics at a time as our budget is not adequate to by all at once because of the move out of the MHz 700 band ban. We have had to spend over \$30,000 on replacements.

Our audio engineer is a professional having worked with every type of entertainment event with over twenty years of 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.

I understand the importance of this issue and can only hope that you understand the importance of this issue as it pertains to the performing arts. We endorse the commission's proposal to expand part 74 LPAS rules to accommodate all performing arts organizations and educational institutions, both of which we represent.

Sincerely,



William A. Carter  
VTPACE and Signature Symphony Technical Director