



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 New Conservatory Theatre Center located in San Francisco, California that provides approximately 300 performances per year to 30,000 audience members and education programs to over 15,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The mission of the New Conservatory Theatre Center (NCTC) is to champion innovative, high quality productions & educational theatre experiences for youth, artists, and the queer & allied communities to effect personal & societal growth, enlightenment and change. Founded in 1981, NCTC began as a small grassroots arts organization dedicated to bringing theatre education to all San Francisco youth. Since then, NCTC has evolved into a multifaceted performing arts institution with educational programming and mainstage performances that reach more than 45,000 children, youth and adults each year.

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.

Currently, NCTC uses wireless microphones for its touring and on site productions, and our assisted listening system is all wireless. For a typical performance we use usually 2 microphones, and 8 microphones in our Youthware program which tours to schools throughout the Bay Area. We have assisted listening devices available for all of our performances in both of our mainstage spaces.

These devices uses the following channels:

- VHF (channels 2-13, 54 MHz to 216 MHz)
- Low UHF (channels 14-36, 470 to 608 MHz)



Since we own all of our equipment it represents a significant investment of the limited resources of our small company. Fortunately most of our equipment was purchased in the last three years we did not have to deal with the move out of the 700 MHz band, however we are concerned about the cost of once again replacing my organization's sound equipment. Now that investment has been made, we would like to know that the system will work properly and without interference.

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 the opportunity to contribute to the Public Comment on this important issue. It is vital that performing arts organizations and educational institutions - especially smaller ones like NCTC that do not have the resources to frequently replace equipment that has been made obsolete through legislation - should have access to reliably available spectrum with interference protection. Therefore, 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.

Sincerely,

A handwritten signature in blue ink, reading "Barbara Hodgen", is written over the printed name and title.

Barbara Hodgen  
Executive Director