

October 11, 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 Omaha Theater Company, located in Omaha, NE, that provides approximately 190 performances per year to more than 60,000 audience members and education programs to more than 2,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Our mission is to enrich the lives of young people and their families through live theater and arts education. We are a theater for young audiences and the only professional theater in our state.

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.

Our theater uses 10-38 units for each performance, which includes the 190 listed above and any other main stage events that require microphones. We currently use Low UHF channels (550-580MHz) for Shure ULX wireless systems and UHF channels (614-698MHz for Lectronics SMV. We use block 25, which transmits on 640.00-665.500MHZ for the Lectronics and J1 band 554-590 MHz fir the Shure system. All of the wireless devices are digital.

We own all the equipment and in 2009 we replaced our entire sound reinforcement system for \$250,000. This included purchasing new speakers, receivers and microphones. Future changes to the spectrum could again force us to spend close to \$100,000 to maintain our current wireless system. I'm sure there is no need to explain how difficult it is to find that amount of funding, which would not only challenge our finances, but also take away precious resources that should be used to enrich the productions and corollary audience experiences.

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**the
Rose**
Performing Arts
FOR CHILDREN AND FAMILIES

We are fortunate in having a Resident Lighting and Sound Director who can guide the theater through our technical needs. Our incumbent is Craig Moxon. Craig has an MFA in lighting and sound from Southern Illinois University. Craig is also a member of USITT.

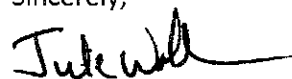
I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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 very important issue. I speak for our theater, and likely other's across the country also agree that Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. This is what helps us bring art and life to our communities. We're a richer world because of the work we do, and access to clear performances is crucial. I would request that the Commission consider the burden we already experienced in the past when we had to vacate the 700 MHz band. We spend our professional lives raising funds, both contributed and earned, to make sure the children and families in our community are exposed to art. Having to raise new, additional funds to replace sound equipment takes away dollars that could instead be used to develop imagination, creativity, empathy and social justice in our young people. We work daily to keep equipment and supplies in working order. It's a function of business to deal with life expectancy issues, but it creates another kind of hardship to have to raise money for this type of change. I am concerned about the cost of once again replacing my organization's sound equipment.

We strive every day to improve quality of life for young people in our area. We do more than entertain, we enhance and often change lives. We also contribute to local economy and help to attract new people to live in Omaha. 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. Thank you very much for your time and consideration of this matter.

Sincerely,



Julie Walker

Managing Director

Omaha Theater Company – The Rose