



Robert M. Hupp
Artistic Director

Jill A. Anderson
Managing Director

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 Syracuse Stage, located in Syracuse, New York, that provides approximately six performances per year to 80,000 to 90,000 audience members and education programs to 21,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

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.

Syracuse Stage is a global village square where renowned artists and audiences of all ages gather to celebrate our cultural richness, witness the many truths of our common humanity, and explore the transformative power of live theatre. As the professional theatre in residence at Syracuse University, we create innovative, adventurous, and entertaining productions of new plays, classics and musicals, and offer interactive education and outreach programs to Central New York.

Syracuse Stage utilizes wireless microphones, in-ear monitors, intercoms for the stage crew, equipment controlling devices that do not transmit sound, and units to support Audio Description and Assisted Listening Devices. Our equipment is also frequently used by the Syracuse University Department of Drama, due to our shared facility and resources. Syracuse Stage typically uses two to four wireless microphones for straight plays, and 22-38 for musicals and large-scale shows, such as our recent co-production with the SU Department of Drama, *The Three Musketeers*.

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In addition, Stage uses four wireless intercom units, two wireless dimmers, three audio assist devices per performance, and three to six audio description units for two performances during the run of a show. Stage uses 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). The variety of microphone styles that we own can tune to more than one frequency, anywhere from 15 MHz to 184 MHz. Of our 46 wireless microphones, eight are digital. All of the other devices are analog, except for the wireless dimmers. Syracuse Stage owns most of the equipment, but will occasionally have to rent. The equipment that Stage owns has a ten year life expectancy. However, the care for some of our units allowed them to last about 20 years and counting.

The switch out of the 700 MHz band was not insignificant for Syracuse Stage. The organization had to purchase three new wireless microphone systems, only losing three in our inventory. However, we had to have two master stations and eight wireless intercom packs returned to the company to be rebanded. The switch cost Syracuse Stage \$5,000-\$6,000 for the three microphone systems, plus \$6,500 for the wireless intercoms, making the switch \$11,500-\$12,500. It took about a year and a half for everything to be replaced.

Our Resident Sound Designer and Audio Engineer, Jonathan Herter, has worked for Syracuse Stage for 20 years. Herter completed a masters program, but not in technical theatre. Most education was done through workshops and research.

I appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

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. 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. 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.

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Sincerely,

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