



PACIFIC CONSERVATORY THEATRE

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 PCPA – Pacific Conservatory Theatre, located in Santa Maria, CA, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

PCPA provides approximately 185 performances per year to 67,000 audience members and education programs to 20,000 students. As a professional conservatory theatre, we train over 100 actors and technical theatre students annually through our program associated with Allan Hancock College. PCPA is committed to reflecting and transforming our diverse community with the art of live theatre. We believe that the theatre has a vital role and responsibility in the community to enrich cultural literacy and improve the quality of life. We commit to serving our current audience, cultivating our future audience and training the next generation of theatre professionals. We aspire to adhere to the best theatrical traditions and to set new standards of excellent artistry, ethics, and professional practice for the future of the theatre.

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.

PCPA produces in three stages in Santa Maria and in Solvang, CA. Our musicals are performed in our 400 seat house in Santa Maria and in our 700 outdoor theatre in Solvang. Wireless mics

are an essential component in our productions and serve as a teaching tool for our students (to learn how to perform with the wireless mics) and to our audiences. PCPA owns our equipment and we use Shure UHF-R (analog), Shure ULX (analog), Shure ULX-D digital transmitters and Clear Com DX 410 wireless com (2.4 GHz band). Wireless Lighting RC4 DMX in the range of 2.4Ghz is the equipment controlling device.

PCPA uses between 25-35 wireless mics per performance and low UHF channels 14-36, 470 to 608 MHz. The only device we use outside of this band is the Clear Com DX410 (2.4 GHz band). Our microphones can tune to more than one frequency – up to 64 MHz tuning range. In the last two years PCPA has received over \$40,000 in grant and foundation funds to upgrade our equipment to the current band specifications. The equipment has an estimated life span of ten to fifteen years.

PCPA has two professional audio engineers/sound designers on staff with a combined thirty years of experience and degrees in Theatre Design and Technology and Music. It is their professional opinion that Part 74 of the license eligibility should be expanded to include professional performing arts organizations and educational institutions that have a need for high quality audio.

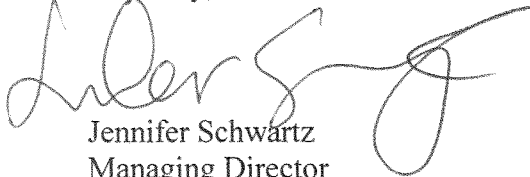
I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. This is crucial for the training of our technical theatre students who are the future of American Theatre and to our audience. With our summer performances in Solvang, PCPA has a significant economic impact on the local economy in the rural Central Coast. 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. PCPA has a four million dollar budget – and we are considered a small professional regional theatre and having to raise money a second time for new equipment is a burden when we are already trying to make ends meet by paying our staff. 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Schwartz", with a large, stylized flourish at the end.

Jennifer Schwartz
Managing Director
PCPA – Pacific Conservatory Theatre