

October 12, 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 Richmond Symphony, located in Richmond, Virginia, that provides over 200 performances per year to over 200,000 audience members and education programs to approximately 55,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Our mission statement reads “The Richmond Symphony performs, teaches, and champions music to inspire and unite our communities.”

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.

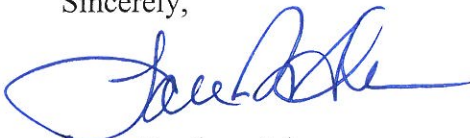
The Richmond Symphony owns and uses wireless microphones and in-ear monitors. We typically use 4 – 8 wireless units on up to 8 programs per season. We utilize the Shure J5 band between 578.000 – 607.975 – 614.025 – 638.000 MHz. All of our wireless devices are analog and are tunable to more than one frequency. We expect our equipment to have a fifteen year life-span.

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 am grateful that the Commission is asking for Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. We specifically purchased our wireless units after the requirement to vacate the 700 MHz band with the expectation that we would have some protection moving forward. This type of financial investment into equipment is a relatively rare occurrence in an organization with our size budget. Any changes that would necessitate an additional investment would preclude us from using our current equipment and leave us unable to update or upgrade our current inventory. Therefore, I would like some assurance that the system will work properly and without interference.

Sincerely,



Laura Bordner Adams
Director of Orchestral Operations