



3630 REDMON STREET • NASHVILLE, TN 37209
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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 Nashville Ballet located in Nashville, TN that provides approximately 35 performances per year to 40,000 audience members, 260 community engagement and education performances that reach out to 31,000 students, and a school of ballet with approximately 1,000 students through our regular school year and summer intensive program, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Our mission is to create, perform, teach and promote dance as an essential and inspiring element of our community. We achieve this through expansive programming, education, public outreach, and community partnerships.

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.



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Many of our performances require wireless intercom for crew use (4-16 units per show), wireless data signals for lighting equipment and special effects control (up to 8 units per show), wireless microphones for vocal and instrumental performances and for lecture presentations. Most of these devices operate in the Low UHF and High UHF ranges, as well as the 2.4 Ghz bands. Our intercom systems are analog based, while most other systems are digital.

I 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.

Nashville, TN is one of the fastest growing metropolitan areas in the United States. Part of the attractiveness and local economic base is built around the number of live performances and arts opportunities the city has to offer. Many of the organizations and venues are operated through non-profits that are not in a position to realistically afford a complete replacement of their existing equipment to accommodate the frequency shift. 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Coogen", with a long horizontal flourish extending to the right.

Todd Coogen

Director of Production