

O^{the}Neill

eugene o'neill theater center

1979 TONY AWARD | 2015 NATIONAL MEDAL OF ARTS | 2010 TONY AWARD

October 6, 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 Eugene O'Neill Theater Center, located in Waterford, Connecticut, that provides approximately 50 performances per year to 8,000 audience members and education programs to 2,800 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The Eugene O'Neill Theater Center, founded in 1964 as a 501(c)3 not-for-profit corporation, is the nation's preeminent theater development center. In the tradition of bold exploration embodied in the work of its namesake, the O'Neill is dedicated to the creation of innovative new works that advance American theater, enriching the lives of artists, students, teachers, and audience members.

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.

EUGENE O'NEILL THEATER CENTER

305 Great Neck Road • Waterford, CT 06385 • PH (860) 443-5378 • FAX (860) 443-9653
www.theoneill.org

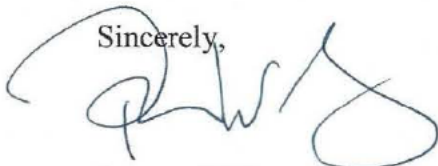
As the leading development institution for new work in the United States, the O'Neill uses very few wireless microphones throughout the year, with primary use during our summer season. We use 5-10 wireless microphones with A/B range wireless transmitters and receivers per performance that uses mics. Many of our presentations do not require microphones, but we use them, on average, 2-3 times a week during our summer season. As we use microphones infrequently, all of our microphones are part of an annual rental package we receive from Production Resource Group (PRG). Due to this, all of our devices are within the TV bands and are able to tune to more than one frequency. We have been lucky enough to receive support from both PRG and our summer staff audio supervisor, often a recent college graduate with a focus in design technology and/or sound design. The Part 74 license would better serve these individuals and our organization as a whole.

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 would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. This is a financial burden that non-profit organizations cannot bear so regularly, particularly as many sources of funding are being taken away. As the only organization in this country to receive two Tony Awards and the National Medal of Arts, the O'Neill intimately understands the impact that performing arts organizations have on local economies, the national cultural imprint, and education. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions like us that use fewer than 50 wireless microphones.

Sincerely,



Preston Whiteway
Executive Director

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