

10/16/17

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 Aliso Niguel High School, located in Aliso Viejo, CA, that provides approximately 25 performances per year to 3000 audience members and education programs to 3000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The Aliso Niguel Theatre Company at Aliso Niguel High School seeks to provide high-quality theatrical productions produced with complete involvement with high school students. These students are not only actors, but directors, designers, technicians, administrators, producers, and overall theatrical artists. Through their passion, talent, and dedication, art is created and shared, and artists are grown, shaped, and allowed to thrive.

I 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.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

In our program we regularly use wireless microphones for our performances. Our theater seats 320, so is big enough to require sound reinforcement. We own and regularly employ 23 wireless microphone systems, both hand held and lavalier. We use Shure microphones both in the low and high UHF ranges. We also use wireless headsets for show tech communication. We have and use 7 of these for any given performance.

We present one large-scale musical each year that employs the entirety of these devices. We also do 5-6 other productions during our school year that employs some of the system in some fashion. In addition, the wireless microphones are frequently used for banquets, meetings, concerts, and other events held in our theater.

Of our 23 wireless microphone systems, 8 of them fall within the 600-700 MHz range and are destined for retirement. Many of these are new within the last 2 years and cost over \$1000 each – a cost not covered by my school or district but funded by this theatre program.

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 thankful that the Commission is open to hearing comments and opinions in this matter. Having access to an adequate range of wireless connectivity is a necessity for educational institutions like ours who are not only providing education to students, but providing a high-quality entertainment option for our community. There will be a considerable burden on our department to replace the wireless systems affected by this issue. Recent purchases were made with the thought that there would be no interference and we could reliably use these devices to achieve our goals.

I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations 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,

Jeremy Golden
Executive Director/Teacher
Aliso Niguel Theatre Company
At Aliso Niguel High School