



GREATER  
THAN THE SUM OF ITS  
ARTS

October 16, 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 LA Opera, located in Los Angeles, CA, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. In just over three decades of existence, LA Opera has become one of America’s most exciting and ambitious opera companies. Led by General Director Plácido Domingo, Music Director James Conlon and President and CEO Christopher Koelsch, the company is dedicated to staging imaginative new productions, world premiere commissions and inventive productions of the classics that preserve the foundational works while making them feel fresh and compelling. In addition to its mainstage performances at the Dorothy Chandler Pavilion, the company explores unusual repertoire through the LA Opera Off Grand initiative, performed in a variety of venues throughout Los Angeles. The company also presents a robust variety of educational and community engagement offerings, experienced by more than 135,000 people each season.

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.

LA Opera uses wireless microphones on a regular basis to record performances for DVD and CD release, for radio broadcasts, and for our yearly simulcast which is presented free to the public at two LA County locations. Of our 36 mainstage performances each year, typically 12-15 performances are recorded and/or broadcast live. In our Off Grand series, wireless microphones are used regularly in live performance. For the most part, we rent our wireless mics depending on our needs.

A 501(c)3 Non-Profit Organization, Dedicated to the Greater Good

PLÁCIDO DOMINGO (L) AND ERYNE BRUNS GENERAL DIRECTOR JAMES CONLON RICHARD SEEVER MUSIC DIRECTOR CHRISTOPHER KOELSCH PRESIDENT AND CHIEF EXECUTIVE OFFICER

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In addition to wireless microphones, we rely heavily on wireless headset and radio communications for the operation of all of our live performances. Our technical personnel for each performance, including stage managers, orchestra managers, carpenters, electricians, audio technicians, prop crew and wardrobe crew, totals over 70. Wireless communications are essential to operating our shows and rehearsals safely and efficiently. LA Opera has continually invests a great amount of money and time to keep our systems up to date and functional in the complex urban frequency landscape of downtown Los Angeles.

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.

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. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

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.

Sincerely,

Michelle Magaldi  
Production Director, LA Opera

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