



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,

I am writing to you on behalf of Theatreworks USA. We offer 2,000 performances every year to 1.5 million total audience members of students, families, and teachers. I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The mission of Theatreworks USA is to create, produce, and provide access to professional theatre for young and family audiences nationwide. Theatreworks USA is the most prolific producer of professional theatre for young audiences in the nation, and the only company of its kind dedicated to working on a national scale. Every year we tour an average of 12 productions reaching more than 1.5 million children, educators, and caregivers throughout 49 states and Canada. Performances of our national tours take place in venues ranging from regional performing arts centers to elementary school cafeterias, reaching urban, suburban, and rural populations throughout the country.

For many people in the United States, the arts are inaccessible due either to cost or geographic location. Theatreworks USA eliminates both of these barriers by keeping ticket prices low and designing our productions to be flexible enough to fit into almost any performance space. Tickets to our shows are priced as low as \$7.25 and with performances in over 1,000 venues nationwide, a production is available to almost anyone who wants to attend. We know that the arts are an invaluable component of a child’s intellectual and emotional development, and we are working to make sure every child can participate in the arts regardless of where they live or the financial circumstances of their families. We take pride in serving as an entry point into the world of the arts for young people across the country, but we can only do this with wireless microphone equipment that is essential to the quality of our productions.

All 12 of our touring productions have been touring with Sennheiser Rf equipment for the past 15 years. We use 6 to 8 wireless units per performance. We currently own and use EW512 G3 systems

in the Low UHF (516 to 558 MHz) 'A' band. When we had to move out of the 700 MHz 'C' band, it cost us over \$35,000.00. We lost the use of 40 units and had to replace them with our current 500MHz units. For a not-for-profit theatre company this was a huge financial blow.

Consistent and reliable vocal amplification is intrinsic to our musicals, it allows us to more fully engage the children we serve by enhancing the auditory aspect of their theatre experience. 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 us and our sector.

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.

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.

We appreciate that the Commission has sought Public Comment on this critical issue. Without access to a reliable spectrum that provides protection from interference, our performances risk being less than professional! Sound equipment is expensive. If purchasing new equipment is an outcome, will the FCC be able to provide assurance that the new system will work properly without interference?

A recent study commissioned by New York City Department of Cultural Affairs called ***The Social Well-Being of New York City's Neighborhoods***, led by Mark J. Stern and Susan Seifert of the University of Pennsylvania, stated that, "across the board, cultural participation correlates with improved health, personal security and school effectiveness," leading to "greater measurable impact in social well-being." For this reason, we respectfully endorse the Commission's proposal to expand Part 74 LPAS rules that will accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones.

Sincerely,

**Robert Daley**  
**Production Manager**  
**Theatreworks USA**  
**151 W. 26<sup>th</sup> St 7<sup>th</sup> floor**  
**New York, NY 10001**