



## CINCINNATI OPERA

**Patricia K. Beggs**

The Harry Fath General Director & CEO

**Evans Mirageas**

The Harry T. Wilks Artistic Director

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 Cincinnati Opera, located in Cincinnati, OH that provides approximately 20 performances per year to 50,000 audience members and 150 programs to 20,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Founded in 1920 and the second oldest opera company in the U.S., Cincinnati Opera presents a thrilling roster of world-class artists and conductors, important company debuts, stunning sets and costumes, and the spectacular Cincinnati Symphony Orchestra. Today the company is hailed as Cincinnati's "prime summer arts festival," attracting a passionate regional audience as well as opera tourists from throughout the U.S. and Canada.

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.

In Cincinnati, we rent digital wireless microphones more and more as the field of Opera grows, offering between 15 and 20 performances each season that require them. These microphones operate on 800 MHz bands. Our staff audio technician, an IATSE sound engineer with more than 10 years' experience, is responsible for placement, mixing, and rental administration of these devices.



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In addition to wireless microphones, Cincinnati Opera's productions function largely due to the use of ClearCom wireless DMXs and short band, 2-way radios. During a single production we use up to 50 of these radios to communicate everything from cues, to spills, to entrances on stage. They are vital to the success of our performances and the safety of our patrons and performers. Purchasing these devices was no small feat. At a cost of about \$38,000 we had to rely on donations and fundraising campaigns to replace our devices in order to move out of the 700MHz band.

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 not only about the cost of once again replacing my organization's sound equipment, but of the countless arts organizations that will be forced to close their doors due to lack of resources. When an investment of this magnitude has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. 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. 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,

Kate Brockmeier  
Production Operations Manager  
Cincinnati Opera