

Alliance Theatre

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 Alliance Theatre, located in Atlanta, Georgia, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The Alliance Theatre is Atlanta's national theatre, expanding hearts and minds on stage and off. We expand hearts and minds through our live theatre productions, field-leading education programming, and community engagement activities reaching more than 165,000 children and adults 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.

The Alliance Theatre uses microphones, in-ear communications (IFBs), cue and control devices, and no-sound transmitting equipment controlling devices for all of our live theatrical productions. Each season, we produce 12 productions between our Alliance Stage and Hertz Stage, and all require the wireless devices outline above. Our productions run six days per week, and our stages are in production from 48 to 52 weeks a year meaning we use wireless devices almost daily. If we have productions running simultaneously on the Alliance and Hertz stages, we use anywhere from 14 to 75 units.

We use the following bands and channels:

- VHF (channels 2–13, 54 MHz to 216 MHz)
- Low UHF (channels 14–36, 470 to 608 MHz)
- High UHF (channels 38–51, the 600 MHz band, 614 MHz to 698 MHz)
- Outside of TV channels, we use 900Mhz for some of our audio equipment and 2.4 GHz for some control devices.

Our microphones can tune to more than one frequency, and their tuning abilities vary. Most tune to 24MHz or less, but several pieces of our newer equipment tune to 80-100MHz. All of our wireless devices are analog. We own and rent wireless equipment each year and rent upward of 60 channels per season. For the equipment we own, we anticipate approximately 12 years of life expectancy before replacements are needed.

Regarding the move out of the 700MHz band, we had few impacted devices, but it cost the Theatre \$2,800 to migrate and replace all of our equipment at once.

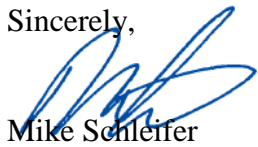
The Alliance employs a full-time audio staff of five. Four of them have Bachelor's degrees in audio/theatrical production, one has a MFA in Sound Design, and all have various audio equipment certifications. This full-time staff has a combined 60 years of experience and are members of USA829 (Sound Design union), IATSE (stagehand union), and TSDCA (Theatrical Sound Designer & Composer Association).

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. Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education and entertainment. They also contribute to local economies in every community across this country. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. 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 needed solution benefitting the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,



Mike Schleifer
Managing Director