



October 7, 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 Oregon Shakespeare Festival (OSF), located in Ashland, Oregon, which provides approximately 800 performances per year to 380,000 audience members and education programs to 60,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

OSF’s mission statement says: “Inspired by Shakespeare’s work and the cultural richness of the United States, we reveal our collective humanity through illuminating interpretations of new and classic plays, deepened by the kaleidoscope of rotating repertory.” Included in that cultural richness and collective humanity are a large number of Festival patrons who depend on sound amplified by wireless microphones to understand and enjoy our performances.

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.

To give you a sense of the scale of OSF’s audio operations and why this rule change is applicable to us, here is some background information. From mid-January to the end of October, six days a week, OSF company members use some sort of wireless device—wireless microphones, in-ear monitors, and wireless communications. The heaviest usage runs from May to mid-October, when the Allen Elizabethan Theatre is using at least 24 channels of wireless microphones per night. Typical usage runs from 8–55 channels of wireless microphones, 1–6 channels of in-ear monitors, and 30 channels of wireless communication.

As far as frequencies, for wireless microphones and in-ear monitoring we use 16 channels in low UHF and 54 channels in high UHF. Our wireless microphones can be tuned to different frequencies. Sixteen of our channels can be tuned between 516–558 Mhz, 30 channels of our wireless microphones can be tuned between 558–626 Mhz, and 24 channels can be tuned between 626–668 Mhz.

All of our wireless microphones and in-ear monitors are analog. Our wireless communication is digital. We own all of our wireless inventory. Reasonable life expectancy is 7–10 years. Because of the length of the season, it is cost-prohibitive to rent any wireless inventory.

The audio staff of the Oregon Shakespeare Festival has a deep commitment to excellence in the presentation of our performances to the 380,000 audience members we serve each year, and an integral part of that excellence is freedom from interference from other wireless devices. OSF has a staff of nine audio professionals. Sound department manager Josh Horvath is an award-winning designer, composer, music producer, and engineer. He is also a member of United Scenic Artists 829 and ASCAP. Altogether, the staff has over 100 years of live audio experience.

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.

Thank you for seeking public comment on this issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. Please consider the burden already borne by the performing arts community in vacating the 700 MHz band.

Performing arts organizations improve our quality of life. They also contribute to local economies in every community across this country. I 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,



Cynthia Rider
Executive Director, Oregon Shakespeare Festival