

# Yale University

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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,

On behalf of Yale School of Drama/Yale Repertory Theatre (YSD/YRT), located in New Haven, CT, that provides more than 200 performances per year to 40,000 audience members and education programs to about 200 students, we write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

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.

Performances at Yale School of Drama and Yale Repertory Theater routinely use wireless microphones (518-698MHz), wireless in-ear monitors (518-698MHz), wireless backstage communication devices (2.4GHz), and wireless assisted listening devices (72.1-75.9MHz). Any given performance will utilize between two and 45 wireless devices, and there may be as many as 15 performances in one week. We own all of these devices.

Reliable, interference-free operation for these wireless devices is a must. Interference can cause a communication failure among members of our backstage crew, a static- and noise-filled experience for patrons using our assisted listening system, an inability to deliver reliable and professional amplification of an actor on stage, a failure of a wireless speaker on stage, and many other

unacceptable outcomes. We are committed to professional expectations in our performances, and must maintain interference-free wireless operation to continue serving that mission.

We employ frequency coordination software and monitoring for every production to ensure professional results, and would gladly submit those frequencies, along with dates, times, and locations, for protection under this new proposal. Our sound staff supervises this frequency coordination, all members of which have graduate-level training in professional sound engineering, with a combined 35 years of experience.

We appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. We request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band and are concerned about the cost of once again replacing the YSD/YRT sound equipment. Once that investment has been made, we 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. We 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,

A handwritten signature in black ink, appearing to read "Shaminda Amarakoon", followed by a horizontal line.

Shaminda Amarakoon

Chair, Technical Design & Production Department