



Weylin Symes
PRODUCING ARTISTIC DIRECTOR

Amy Morin
MANAGING DIRECTOR

October 10, 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 Greater Boston Stage Company, located in Stoneham, MA., that provides approximately 250 performances per year to 50,000 audience members and education programs to 350 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. We bring vibrant professional theatre and dramatic education beyond the boundaries of Boston, featuring world and regional premieres alongside fresh interpretations of familiar work. Within this setting, we uniquely foster the artists of tomorrow by providing ongoing performance and employment opportunities to our company of current and former students.

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.

We currently own 4 lavalier wireless microphone and 2 handheld wireless microphones. However, on the average of 3 times a year we will present a large musical and can rent

as many as 20 lavalier wireless microphones to augment our stock. These are necessary as our musicals will have 3-9 musicians that the singers need to be heard over. These musicals are our big money makers and help to support the short falls that we sometimes experience when we do more serious or controversial theatre events.

All the wireless units we own operate in the 600 MHz band. They do have the capability to tune in more than one frequency with the proper selection of interference free frequencies that we find in our area. All of these devices are analog. As we have no sound personnel on staff, we must rely on engineers we hire on a show by show basis to help us deal with these frequency issues.

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.

Greater Boston Stage Company provides a public benefit and contributes to the cultural vitality of Stoneham and the surrounding suburban areas in the following ways:

- Stoneham students receive arts education through The Young Company, Greater Boston Stage Company's year-round education program.
- Stoneham children will receive a discounted ticket price to attend performances in school groups.
- Stoneham seniors will have the opportunity to attend senior matinees at a discounted ticket price.
- Stoneham residents don't have to travel far for affordable, world-class theatre.
- Stoneham's property values receive a positive impact from the theatre's location in Stoneham.

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,
Dave Brown
Production Manager
Greater Boston Stage Company
Stoneham, MA