



RED MOUNTAIN THEATRE COMPANY

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John Sellers
David Silverstein
Shannon Smith
David Smitherman
Frank Sottosanti
Susan Stabler
Chris Terrell
Darrell Vines
Perry Ward

* deceased

October 11, 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 Red Mountain Theatre Company (RMTc), located in Birmingham, AL, that provides approximately 120 performances per year to 60,000 audience members and education programs to 15,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. RMTc is a nonprofit with a mission to create powerful theatre experiences that enrich, educate, and engage audiences - nourishing the human spirit, fostering valuable life skills, and cultivating a deeper sense of community.

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.

On a weekly basis, RMTc uses anywhere between 4 and 35 wireless microphones, 4 wireless IFB intercoms, and 4 two-way radios. The analog wireless microphones and IFB intercoms operate in the range of 470 MHz to 668 MHz, while the two-way radios operate in the 136-174 MHz and 400-520 MHz ranges. Each of these microphones can tune to multiple frequencies within an approximate range of 50 MHz. In addition, RMTc currently owns



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55 wireless microphone systems with a reasonable estimated life expectancy of 8 to 10 years. To comply with the move out of the 700 MHz band recently, RMTC purchased 4 new wireless units at a cost of \$2,800. This replacement and expense was spread out over 2 seasons.

RMTC employs one full-time Resident Sound Designer/Engineer who maintains all of our equipment. In conjunction with maintaining and operating all the equipment listed above, this staff member coordinates all wireless frequencies on an as needed and per performance basis, which is becoming increasingly difficult to manage in an ever-changing wireless environment.

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.

RMTC, and other performing arts organizations, provide many valuable services to the public including but not limited to entertainment, education, and economic growth. While improving the quality of life and preserving cultural heritage, RMTC also achieves success in creating a well-rounded, inclusive and vibrant community. The Staff, Designers, Resident Artists, and Talent at RMTC 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. This proposal is a much-needed solution which will address the many new and emerging unlicensed white space technologies, and will benefit our organization and so many other arts organizations like it nationwide.

Sincerely,

Keith Cromwell
Executive Director

Jennifer Jaquess
Managing Director