



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 the Baltimore Symphony Orchestra, located in Baltimore, Maryland, that provides more than 130 performances per year to over 350,000 audience members and education programs to more than 30,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The Baltimore Symphony Orchestra (BSO) is internationally recognized as having achieved a preeminent place among the world’s most important orchestras. Acclaimed for its enduring pursuit of artistic excellence, the BSO has attracted a devoted national and international following while maintaining deep bonds throughout Maryland through innovative education and community outreach initiatives.

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.

BSOMUSIC.ORG

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The BSO uses wireless microphones at virtually every performance. We currently own eight wireless Shure UHF single-frequency microphones, all of which are in the 600MHz range. We use between two and eight microphones in a typical performance. These are analog microphones. Barring any changes in available frequencies, we would expect to be able to use these microphones for nearly ten more years.

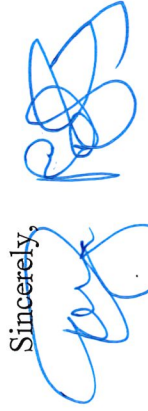
I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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 comments on this very important issue. Professional performing arts organizations and educational institutions must 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. It would be a significant difficulty for us to replace our equipment once again.

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.

Sincerely,



Tonya McBride Robles
Vice President and General Manager