



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 Woolly Mammoth Theatre Company, located in Washington, D.C., that provides approximately 240 performances per year to 50,000 audience members, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Our mission is *to create rousing, visceral, enlightening theatre experiences that galvanize diverse artists and audiences to engage with our world in unexpected and often challenging ways.*

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 regularly use wireless devices for our productions as well as peripheral events in the main theatre space, rehearsal hall, and lobby. Most of our events and programming requires some use of wireless devices and we always have wireless assisted listening devices available for our patrons. We have five wireless microphone kits that included receivers and beltpacks (Shure ULXP4) that operate in the Low UHF: 3 on the J1 band (554-590 MHz) and 2 on the G3 band (470-507 MHz). We have a Listen LT-800 Hearing



Assist system with a transmitter and 10 receivers for patrons who require auditory reinforcement that operates in the VHF band (216-217 MHz range). Finally, we also have one Senheiser EW 300 G2 In Ear Monitor kit that operates in the 518MHz to 544 MHz range.

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.

Thank you for this opportunity to advocate on behalf of performing arts organizations. We are providing a service to the public that educates, enriches and preserves our culture. Professional performing arts organizations would benefit greatly from protected reliable access to available spectrum with interference protection.

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. We already undertook significant financial burden in vacating the 700MHz band and we all share a real concern about costs associated with additional restrictions. 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 that reads "Meghan Pressman".

Meghan Pressman
Managing Director