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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 Manhattan School of Music, located in New York, NY, that provides approximately 1600 performances per year to over 5000 audience members and education programs to over 1500 students, we write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Manhattan School of Music is deeply committed to excellence in education, performance, and creative activity; to the humanity of the School's environment; and to the cultural enrichment of the larger community. A premier international conservatory, MSM inspires and empowers highly talented individuals to realize their potential. We take full advantage of New York's abundant learning and performance opportunities, preparing our students to be accomplished and passionate performers, composers and teachers, and imaginative, effective contributors to the arts and society.

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.

In a typical performance, we use 2 wireless mics. For larger productions and presentations, like our brand new Musical Theatre major mainstage performances, we will use an average of 24-30. Given our busy production schedule, we use wireless devices daily, often multiple show per day. We use Lectro LMa/HHA/HM transmitters, a Venu receiver - 650~700 MHz, and Shure U2 & U4D in addition to Shure BLX288/PG58. We use the High UHF bands and our microphones do tune to more than one frequency; our Shures are unknown, and the LMa is 25.6 MHz wide (665.5 - 691.1). All of our wireless devices at this time are analog except the Lectro which are hybrid digital. We own some wireless gear and rent additional as needed. For most of our gear, we anticipate a life expectancy of 20+ years. We were able to retune for the move out of the 700 MHz band in 1 day. We have a staff of several professional engineers and technicians. We also have relationships with several rental companies who provide us with gear and technical support.

We 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.

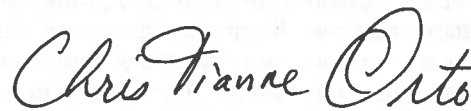
We are grateful to be able to comment on this very important issue. As an educational institution in a large city that competes for bandwidth with other professional performing arts organizations and other frequency-utilizers, it's critical to have access to reliably available spectrum with interference protection. We would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. As a small private conservatory, we're concerned that this would impact the level of support we can provide our students and community.

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,



Mary Kathryn Blazek
Director of Production



Christianne Orto
Dean of Distance Learning and Recording