

# BOSTON BALLET

MIKKO NISSINEN ARTISTIC DIRECTOR

Friday October 6<sup>th</sup> 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 Boston Ballet Inc. located in Boston, MA. that provides approximately 100 performances per year to 175,000 audience members and three major community/education programs to more than 5000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

At Boston Ballet, we honor our rich artistic heritage as we continue to push the boundaries of dance. For more than five decades, we have mesmerized audiences with our sweeping repertoire, which spans from cherished 19th-century classics to contemporary show-stoppers. We perform in the historic, 2,500-seat Boston Opera House and reside offstage in a state-of-the-art facility headquartered in Boston’s South End.

The Company is comprised of 70 dancers of 17 nationalities, representing the highest caliber of international talent on our Boston stage. We present a broad repertoire, including timeless classical ballets, such as Marius Petipa's *The Sleeping Beauty*, Rudolf Nureyev's *Don Quixote*, Sir Frederick Ashton's *Cinderella*, George Balanchine's *A Midsummer Night's Dream*, Mikko Nissinen's *Swan Lake*, Florence Clerc's *La Bayadère*, and John Cranko's *Romeo and Juliet*; neo-classical ballets with masterworks by George Balanchine; and innovative contemporary ballets from choreographers including William Forsythe, Jiří Kylián, Wayne McGregor, Mark Morris, Christopher Wheeldon, and Boston Ballet Resident Choreographer Jorma Elo.

Boston Ballet School serves more than 5,000 students at locations in Boston, Newton, and the North Shore, with programs designed for ages two through adult, at all experience levels. Boston Ballet School provides training for the next generation of professional ballet dancers, and the highest quality dance education for all.

Our Department of Education and Community Initiatives (ECI) reaches 4,000 individuals in Boston and the surrounding communities each year through our programming, events, and activities. For more than 25 years, our Citydance program has provided third grade students from Boston public schools with a tuition-free introduction to dance education.

Our internationally-acclaimed performances, world-class education programs, and ground-breaking community initiatives have made us a leader in our field, with a 53-year history of promoting excellence and access to dance.

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.

At Boston Ballet we rely on Wireless Microphones and Wireless Communication Systems to professionally support our performances. We use wireless microphones for announcements and presentations as part of, or in addition to our performances. We rely on our wireless communication system to effectively communicate all coordinated actions onstage for every performance. We typically use 12 wireless communication belt packs, and 3 – 10 wireless microphones. We have invested a good deal of money into purchasing and maintaining these systems. Our wireless microphones and wireless communication systems operate in the Low and High UHF bands. These wireless systems are able to tune to different frequencies within their respective operating bands. We own 3 Telex BTR 800 digital communication rack units capable of two way communication on 4 channels per unit. We also own 8 channels of Sennheiser

Evolution G3 wireless microphone systems. For special occasions we do rent additional wireless microphone and communication systems. As the Audio Video Coordinator for the Boston Ballet I am responsible for the operation of all of our wireless communication and microphone systems. I have been working as an AV professional for more than 15 years and have an MFA in technical production from Boston University and a BFA in Lighting Design from Emerson College.

I 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 Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of replacing my organization's wireless communication and wireless microphone equipment. If we replace all of our equipment that operates above 600MHz, I would like some assurance that the system will work properly and without interference.

As a Performing arts organization we provide a demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. We also contribute to our local economy. 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,  
Richard Brenner  
AV Coordinator  
Boston Ballet  
Boston, MA.  
02116