

# NORTHLIGHT THEATRE

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 Northlight Theatre, located in Skokie, Illinois, which provides 215 performances per year to audiences of over 50,000 and education programs to 4,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Northlight's mission is: "Northlight Theatre aspires to promote change of perspective and encourage compassion by exploring the depth of our humanity across a bold spectrum of theatrical experiences. We seek to entertain, enlighten, and electrify our audiences through contemporary dramas, intimate musicals and refreshed classics. We are fearless in our commitment to champion new work, and to provide a nurturing and creative home for our artists. We are relentless in our pursuit of excellence through our productions, our business practices, our outreach, and our education. Northlight Theatre reflects our community to the world and the world to our 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.

Wireless microphones are an integral part of any live theatre production, as a vital communication tool backstage and as vocal enhancement to improve audience experience. Preserving the bandwidth for use by theatres is essential to our businesses. Northlight uses about two dozen Shure and Sennheiser Analog UHF Wireless microphones, on frequencies between 525 MHz and 640 MHz, as well as Shure PSM 200 In Ear Monitors on occasion. All our microphones are flex frequency within the ranges listed. Typically, we use four handheld transmitters during each play and for post-show discussions, and for a staged reading or musical we use between 8-12 transmitters on average. Northlight produces 5 productions for 6 weeks each, 8 performances a week, and usually has an additional 2 to 5 readings per season. We rent additional inventory for musicals and large cast productions which have needs that exceed our stock equipment. We have a full-time audio engineer on staff for 40 weeks per year; she has 2 years of college education in audio engineering and design and 16 years of professional experience as an audio engineer, sound technician and sound board operator.

ARTISTIC DIRECTOR BJ Jones || EXECUTIVE DIRECTOR Timothy J. Evans

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When the 700MHz band was closed to us in 2011, Northlight spent over \$12,000 to replace our affected sound inventory. Life expectancy of this equipment is approximately 15 years; Northlight's current inventory is only in the middle of its life span. To be forced to re-equip again so soon would be a serious hardship for our business.

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.

Theatres are vital parts of the cultural and economic fabric of our communities, bringing people together in turbulent times and providing education as well as entertainment. We are small businesses who support jobs, buy services, and bring patrons into our communities to patronize other local businesses. We ask that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. 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,



Timothy J. Evans  
Executive Director



Scott Miller  
Production Manager