



October 7, 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 Theatrical Sound Designers and Composers Association, a national association of theatre artists, headquartered in Chicago IL, whose designers and composers create content for hundreds of performances per year for thousands of audience members, we write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. As sound designers, composers, score writers, sound artists and musicians, we rely on RF transmission systems to control our hardware, present our recorded music and sound, reinforce live voices and instrumentalists in dramatic works, musicals and opera, as well as many commercial and non-commercial installations. These systems are essential to the success of our work. They help us tell stories, provide safety and vital communication for stage crews that run performances including the operation of complex and dangerous stage machinery, and provide quality sound to people with hearing impairments. 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 all wireless transmission systems. We support and endorse the comments filed in these dockets by The Performing Arts Wireless Microphone Working Group. Professional wireless capability, with successful interference protection, is essential to our artists.

Collectively we use a wide variety of wireless devices. They include handheld and body worn wireless microphones, RF microphone systems hidden in scenery and props, in-ear communications systems (IFBs and IEMs), intercom systems, as well as cueing and show control devices. Our professional productions may use as few as ten (10) RF systems or a much higher number depending on the production needs. The vast majority of our productions would use fewer than fifty (50) RF channels. These units have become staples in our professional audio work on Broadway, regional theatre, themed entertainment, and much more.

The bands we typically use fall between 470 and 698 MHz. There's not much activity in the 54-216 MHz bands, although there is some. Many new microphone systems are frequency agile (meaning, tunable within limits.) Many listening assist wireless systems operate in the 72-76 MHz bands and dedicated systems run in the 216-217 MHz bands.

Some producers were forced to purchase new equipment when the 700 MHz bands became unavailable. The purchase price for each channel of professional RF can range from \$1700.00 to \$3000.00. While Broadway shows typically rent wireless technology for productions, the vast majority of professional regional and academic producers own their equipment and replacement would create an extraordinary hardship. It would also not be easy for commercial equipment rental companies, as they too would have to replace hundreds of units in total.

Most professional theatrical producers have staff engineers or audio supervisors who are highly trained in the application of these RF systems. This expertise comes from academic technical training and a large amount of practical experience in the field. Manufacturers also provide detailed information to help engineering staff use and maintain the systems. Many provide operational certification.

I hope the Commission would grant a Part 74 license if an applicant would provide certification of the following:

That they are a practicing professional performing arts entity, either as a producer, rental house, educator, or other related field. This could include a mission statement.

The ability to assess and coordinate usable frequencies without interference.

The ability and commitment to register the frequencies, times, and locations actually needed, including back up systems.

The professional practice of logging all wireless microphone use, including frequencies, for all rehearsals and performances.

The performing arts have always been a valuable window into our society, providing thought-provoking work that stimulates discussion, encourages people to engage, and tells stories that bring us together. The arts also support individual artists who do not make a lot of money for all their work as well as the community businesses that thrive around art centers. There is a passion that drives us to connect communities as well as provide entertainment. Professional arts organizations work extremely hard to stay vital and healthy in this time of shrinking arts funding. We strive to find fiscal balance in this time of changing priorities, increased nationalism, and waning governmental support of the arts. Please understand that we have already paid a price for the elimination of licensing in the 700 MHz bands.

The membership of TSDCA sincerely appreciates this opportunity to comment on this very important issue for professional theatre artists. We endorse the proposal to expand Part 74 LPAS rules that support so many performing arts organizations and educational institutions that use fewer than 50 RF transmission systems.

Sincerely,
The Membership of TSDCA
Theatrical Sound Designers and Composers Association