



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 Imagination Stage, located in Bethesda, MD that provides approximately 300 performances per year to nearly 100,000 audience members and education programs to over 4,000 students of all abilities, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Imagination Stage empowers all young people to discover their voice and identity through performing arts education and professional theatre. Imagination Stage envisions a future where theatre experiences are a fundamental aspect of children's lives, nourishing their creative spirit, inspiring them to embrace the complexity and diversity of their world, and helping them overcome their challenges with hope, courage and, above all, creativity.

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 Imagination Stage, we use wireless mics on a nearly daily basis. Their ability to function without interference is crucial to producing the high professional quality of shows for children that we are known for. Depending on the show, we use a minimum of 6 wireless microphones, and can use up to 31. We currently own 12 digital mics in the 470-534MHz range, 15 analog mics in 470-530 MHz range, and 4 analog mics in 662-698 MHz range. Due to the last frequency auction, we had to begin the process of securing replacements for the mics on the 662-698 MHz band. In order to fully upgrade our system to meet the new requirements, we will spend over \$60,000. As a not for profit children's theatre, this is a huge expense, and it is imperative that our equipment last us the next 10-15 years that we are expecting.

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.

I appreciate that the Commission has sought Public Comment on this very important issue. In order to continue to provide the professional level quality that we're known for, it is imperative for us, as well as other professional performing arts organizations and educational institutions to 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. If forced to vacate another frequency band, it would cost us another \$60,000. This would be a hugely detrimental expense for us, so we need some assurance that our newly upgraded system will work properly and without interference.

Imagination Stage is an important part of the lives of thousands of children across Montgomery County and DC metro area. We pride ourselves in the high quality, intelligent, and challenging art we are able to create for children. It is crucial for us to be able to continue to provide the level of professional arts programming that the area youth deserves. 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,

A handwritten signature in black ink, appearing to read 'J. Schwartz', written over the printed name.

Jennifer Schwartz
General & Production Manager
Imagination Stage
4908 Auburn Avenue
Bethesda, MD 20814