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October 13, 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 Hopkins Center for the Arts, Dartmouth College, located in Hanover, NH, that provides approximately 350 performances per year to over 45,000 audience members and education programs to over 18,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

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.

The Hopkins Center owns 24 Shure UR wireless microphone systems and 2 PSM900 Shure wireless IEM systems across our three venues. These microphone systems are in used in almost every production that is staged in the venues. We occasionally supplement this gear with rented equipment for larger performances occasionally adding an additional 6 microphones and/or IEM devices. All of these devices are frequency selectable within their band. Microphones fall in the J5 (578-638MHz) band and IEMs fall in H4 (518-578MHz) band. While the typical industry life expectancy for AV equipment is 5-7 years, we do not have the funding to replace the equipment that often. Some of the units are approaching ten

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years of use. Fortunately we were not affected by the change to the 700MHz band and did not have to exchange or purchase new equipment. We currently have no capital expense planned for replacement of our current equipment should there be another change mandating a move out of the low 600MHz range. Replacing these units would be cost prohibitive (>\$54,000) and negatively impact our ability to produce our events. We have two full time audio technicians on staff who are responsible for the maintenance and performance operation of the wireless equipment. One staff member has a MFA in sound design, and both are regular attendees at annual industry conferences and conventions such as USITT and AES/NAB.

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 am pleased to see that the Commission is accepting 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 respectfully appeal to you to consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the financial burden of replacing our sound equipment and once that investment has been made, I need some assurance that the system will work properly and without interference.

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 will benefit the future of many arts organizations and the communities that they serve.

Sincerely,



Mary Lou Aleskie  
Howard L. Gilman '44 Director  
Hopkins Center, Dartmouth College