



University of Colorado
Colorado Springs

Monday October 16th, 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 UCCS Presents, the University of Colorado, Colorado Springs, and the newly opening Ent Center for the Arts, located in Colorado Springs, Colorado, that will provide hundreds of performances per year to tens of thousands of audience members and education programs to over 12,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. UCCS Presents supports arts, culture, and community for UCCS and the Pikes Peak region through its programs which include the University Center and Event Services, UCCS Galleries of Contemporary Art, Theatreworks, and a new music and dance series which will debut at the Ent Center for the Arts in February 2018.

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.

Our organization currently uses wireless microphones that operate in the low UHF band between 534MHz and 598MHz as well as handheld radio communication devices used for daily operations and emergency management. Our base inventory consists of 16 digital wireless units that feature multiple tuning options with a maximum tuning range of 64MHz. Additional units

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will be supplemented through rental agreements as needed to meet performance requirements and may operate outside of the band stated above. Our maintenance cycle plan identifies a life-expectancy of six to eight years for our digital wireless units and eight to ten years for our radio communication devices.

With an event schedule that hosts multiple performances per week and up to four simultaneous shows in one day, frequency coordination is of the utmost importance in order to successfully produce interference-free events on campus.

The Ent Center for the Arts will operate as both an employer of professional technicians from the Pikes Peak region as well as serve as trainer and employer for students seeking to become professionals in the performing arts. It is the ideal scenario to practice and train the protocols stipulated in the Part 74 License best practices. Supervising this training and operation are a staff consisting of full and part time performing arts technicians who will be working in an environment where the appropriate tools, supervision, and motivation have been provided as a means of meeting the needs of the facility while understanding and practicing FCC policy compliance.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

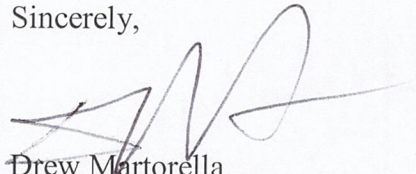
- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent 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. 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 600 MHz and 700 MHz bands. I am concerned about the cost of once again replacing my organization's audio equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. 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 dark ink, appearing to read 'DM', with a long horizontal stroke extending to the right.

Drew Martorella
Executive Director
THEATREWORKS
UCCS Presents