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2017-18 SEASON

October 16, 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 Stages Theatre Company, located in Hopkins, MN, that
provides approximately 350 performances per year to 145,000
audience members and 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.

Wireless devices are extremely important to Stages Theatre Company
in order to provide professional theatre experiences to our young
audiences, as well as protect the developing voices of our youth
performers who often perform 35+ shows per production. Our current

technology includes wireless microphones and cue and control devices. We typically use 10 to 25 units per performance, with 8 to 10 performances a week over a 35 week season. Our microphones are able to tune to more than one frequency with a tuning ability of 541 MHz to 566 MHz. We currently own 22 analog devices and 12 digital devices; we also rent wireless equipment when necessary. The move to 700 MHz band is creating a financial burden to our organization; we have invested \$7,500 to replace 4 wireless mics. Others will be replaced as funds are available.

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.

Our mission at Stages Theatre Company is “the enrichment and education of children and youth in a professional theatre environment that stimulates artistic excellence and personal growth”. In order to carry out this mission, 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,



Sandy Boren-Barrett
Artistic Director
Stages Theatre Company

