



October 15, 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 Work Light Productions, located in Summit, NJ, that provides approximately 1,200 performances per year to 1,800,000 audience members in over 350 venues, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Work Light Productions is dedicated to creating and producing live entertainment. From touring productions of Tony Award winning musicals, to original concert and theatrical work, our critically acclaimed productions reach tens of thousands of theater lovers each year. We are honored to collaborate with world-class creative professionals whose artistry inspires each and every production.

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.

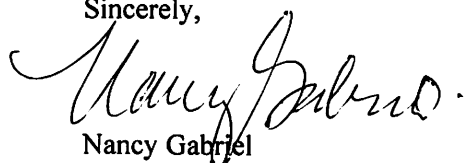
Work Light Productions would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- 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.

We, at Work Light Productions, appreciate and thank the Commission for seeking public comment with regard to this issue. As a Production and General Management entity that produces and manages multiple Broadway tours, we rely heavily on the use of wireless microphones in order to produce high quality theatrical productions. Over the course of one tour, we visit over 90 different performing arts venues around the country.

We depend on these venues in order to reach tens of thousands of theater goers each year. We ask that you consider the significant investment in communication devices that performing arts organizations have already made, by allowing them to use their existing equipment for as long as possible. Part 74 LPAS, as it stands now, will place a substantial financial burden on performing arts organizations and educational institutions that use fewer than 50 wireless microphones, forcing them to purchase new expensive equipment. Please consider the proposal to expand Part 74 LPAS rules in order to protect these performing arts organizations and educational institutions affected. In conclusion, we ask that you do everything in your power to protect wireless technology used in the performing arts.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Gabriel". The signature is fluid and cursive, with a large initial "N" and a long, sweeping underline.

Nancy Gabriel
Producer
Work Light Productions