

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference Advisory Committee)	

COMMENTS OF LECTROSONICS, INC.

Lectrosonics, Inc. respectfully submits these Comments in response to the Public Notice issued by the Commission seeking comment on the draft recommendations prepared by its World Radiocommunication Conference 2019 Advisory Committee.¹

I. Introduction

Lectrosonics, Inc. is a manufacturer of professional wireless microphone and IFB (interruptible foldback) cueing and control systems used in TV production, filmmaking, and live sound performances. For over 30 years Lectrosonics has produced equipment marketed into many markets worldwide, including the United States, Canada, the European Union, Australia and Japan, to name a few.

II. Draft New Resolution WAC/085 (11.03.19), to Consider:

Studies on additional frequency bands outside the 600 MHz and 700 MHz bands between 150 MHz to 2 000 MHz, and worldwide and/or regional harmonization for terrestrial electronic news gathering systems.

Lectrosonics wireless microphone products are used for a wide range of applications by a diverse group of professional audio users. Our core market has traditionally been made up of Program Making and Special Events (PMSE) users, whose activities include film, video and television production and electronic news gathering (ENG). These users may employ as few as 6 or 8 channels of wireless microphones on a production, or as many as 100 channels or more in some very large productions. In these applications, Lectrosonics wireless microphone products

¹ Public Notice, International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee, IB Docket No. 16-185, DA 18-1017 (Oct. 3, 2018) (“Public Notice”).

are most often used in conjunction with other wireless microphone devices and communication tools including interruptable foldback (IFB), in-ear monitor (IEM), and musical instrument systems. An example is a recent NBA playoff game series where over 400 channels of wireless microphones and other ENG/PMSE systems were coordinated for each event. Other sporting events may see fewer total channels (48 - 120, typically) but major events like the Superbowl can use more than 3,000 channels.

Most Lectrosonics ENG/PMSE products operate in the standard UHF TV band between 470-698 MHz. We also manufacture and market products in other frequency bands including wireless microphone and IFB systems 174-216 MHz part of the VHF TV band and in the new 941-960 MHz band available in the United States.

The fact that the UHF TV terrestrial broadcast band was large and contiguous in frequency (excepting TV channel 37), meant that applications with high channel counts could be supported as there was enough spectrum available in most or all TV markets. Another attractive aspect of the UHF band was that products designed for this band can be offered in many international markets because the same spectrum is available for wireless microphone operations there also.

However, the UHF TV band is diminishing. The repurposing of the 600 and 700 MHz bands in the United States increased spectrum congestion dramatically in many localities. As noted in the Draft Resolution, administrations in many parts of the world are re-allocating spectrum away from ENG/PMSE also. We anticipate similar spectrum congestion to arise in our export markets as the 700 and 600 MHz bands are repurposed, and therefore a need to allocate additional spectrum for wireless ENG/PMSE equipment. To achieve needed economies of scale in manufacturing of ENG/PMSE equipment and simplify its application by nomadic users, new allocations and technical rules should be harmonized worldwide as much as possible.

Lectrosonics welcomes and supports the Committee's Draft New Resolution to identify additional spectrum for ENG use, with worldwide or regional harmonization of frequency allocations and technical rules. We encourage the Commission to recommend it to the Department of State.

Respectfully submitted,

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