

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Microsoft Petition for Rulemaking Seeking)	ET Docket No. 14-165
Amendment of Part 15 of the Commission's Rules)	
for Unlicensed Operations in the Television Bands,)	
Repurposed 600 MHz Guard Bands and Duplex)	
Gap, and Channel 37)	

Reply Comments of
League of American Orchestras

On behalf of the League of American Orchestras and our diverse membership of more than 2,000 organizations and individuals across North America, we write to support our colleagues at Theatre Communications Group and share our concerns about Microsoft Corporation's Petition for Rulemaking.¹

As we understand it, Microsoft's proposals would result in significantly increased possibilities of interference to wireless microphones, cue and control devices, and assistive listening systems in use in performing arts venues throughout the country.² While we appreciate that certain protections are afforded to wireless microphone users in Microsoft's petition, we are greatly concerned about the lack of protection to *unlicensed* wireless microphone users – many of which are located in rural areas and are not currently eligible for Part 74 licenses, even though they provide similar services to the public as licensees.

Because there are so very many nonprofit performing arts entities that would not be eligible for a Part 75 license and its protections, we therefore urge the Commission not to move forward on Microsoft's proposals until (1) the White Space geolocation database is

¹ Petition for Rulemaking of Microsoft Corporation, filed in ET Docket No. 14-165 on May 3, 2019.

² See Comments of Shure Incorporated in ET Docket No. 14-165 dated June 10, 2019.

operational and effective and (2) the Commission has adopted its proposed rules to expand Part 74 licenses to worthy users.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jesse Rosen', with a stylized, cursive script.

Jesse Rosen
Executive Director
League of American Orchestras
33 West 60th Street, 5th floor
New York, NY 10023
(212) 262- 5198

Dated: June 21, 2019