



**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
Alliance of Resident Theatres/New York (A.R.T./New York)**

On behalf of the Alliance of Resident Theatres/New York (A.R.T./New York) and our more than 400 professional, not-for-profit Member Theatres throughout New York City, we write to share our concerns about Microsoft Corporation's Petition for Rulemaking.¹

We want to acknowledge from the outset that A.R.T./New York is supportive of greater broadband connectivity in rural areas of the country. However, Microsoft's proposals would result in significantly elevated possibilities of interference to wireless microphones, cue and

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

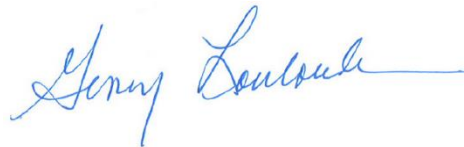
control devices, IFB, and assistive listening systems in use in theatres across the country.² The protections that Microsoft outlines in its Petition would only be of benefit to *licensed* wireless microphone users. There are important users of wireless microphones in rural areas that would be at risk by this proposal, and they are not licensed. Oregon Shakespeare Festival in Ashland, Oregon and Bloomsburg Theatre Ensemble in Bloomsburg, Pennsylvania are but two examples of professional theatre companies that are located in and serve rural communities. They are not currently eligible for Part 74 licenses, even though the Commission has recognized that they provide similar services to the public as licensees and are eligible in every way other than the regular use of 50 or more microphones.³

Microsoft suggests increased power and mobility for White Space Devices that would not necessarily be limited to rural areas and provides that licensed wireless microphone users will be protected by the geo-location database. Our concerns are two-fold: we understand that the databases are not currently operational, and almost all of the professional, not-for-profit theatres across the country – including those in rural areas – are not currently eligible for a Part 74 license. We urge the Commission not to move forward on Microsoft's proposals until (1) the White Space geolocation database is operational and effective and (2) the Commission has adopted its proposed rules to expand Part 74 licenses to worthy users.

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

³ See Order on Reconsideration and Further Notice of Proposed Rulemaking in ET Docket No. 14-165, July 14 2017.

Respectfully submitted,

A handwritten signature in blue ink, reading "Ginny Loulodes", with a long horizontal flourish extending to the right.

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