

**Before the  
Federal Communications Commission  
Washington, DC 20554**

**In the Matter of**

# Microsoft Petition for Rulemaking Seeking 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

ET Docket No. 14-165

## **Reply Comments of Weston Playhouse Theatre Company**

On behalf of Weston Playhouse Theatre Company (WPTC), a leading regional theater serving over 25,000 patrons annually and located in the rural community of Weston Vermont, I write to share our concerns about Microsoft Corporation's Petition for Rulemaking.<sup>1</sup>

I want to acknowledge from the outset that WPTC is supportive of greater broadband connectivity in rural areas of the country. As a \$2.5 Million non-profit, 501(c)3 organization in a small town with a population of 500, WPTC knows how important improved broadband connectivity is to the country's remote areas. However, Microsoft's proposals would result in significantly elevated possibilities of interference to wireless microphones, cue and control devices, IFB, and assistive listening systems in use in theatres across the country.<sup>2</sup> 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. Approximately 50% of WPTC's annual earned income comes from theatre productions that rely on

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

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



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wireless microphones. WPTC is not currently eligible for a Part 74 license, even though the Commission has recognized that it provides a similar services to the public as licensees and is eligible in every way other than the regular use of 50 or more microphones.<sup>3</sup>

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. The concern is two-fold: WPTC understands 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. I 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.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Susanna Gellert".

Susanna Gellert  
Executive Artistic Director  
Weston Playhouse Theatre Company

Dated: June 24, 2019

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