

DENISON  
UNIVERSITY

October 10, 2017

EX PARTE OR LATE FILED

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel

Received & Inspected

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OCT 16 2017

FCC Mail Room

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 Denison University's Eisner Center For The Performing Arts, located in Granville, OH, that provides approximately 40 performances per year to 1200 audience members and education programs to 1800 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

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.

We are an educational facility and, as such, we provide training for our students in the latest technology and practices. We utilize anywhere from 15-40 wireless microphones around our 5 performance spaces in around 25-30 performances per academic year. We also use 6-8 wireless communication headsets in those performances for safe and accurate backstage support of the performers and the audience. We have also used wireless technology to control lighting, motion control mechanical devices and effects. The technology that uses the available wireless bands is broad and, at times, needed for safety of the performers, technicians and audience members.

We are roughly 12 months away from the completion of a \$30+ million dollar performing arts facility. The technology being installed relies heavily on the bandwidths currently available. The investment in the devices has already been made. We will be operating these from the UHF bands between 470 and 698 mhz ranges. These are adjustable to avoid conflict with nearby devices and almost all are digital. Since we are purchasing these, the budget outlay is already close to \$100,000 for the devices and related equipment. With that kind of investment, we expect these to last upwards of 8-10 years. We will not have the budget to replace every wireless device that will use possibly restricted bandwidths. To lose these devices will considerably cripple our ability to train students and safely run productions, as well as the considerable loss in the budget.

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We are coordinating with professional consultants through IATSE and USITT. I hold an MFA in Theatre Production and have been a member of USITT for over 20 years with an emphasis on technology. Our acoustician consultants are Jaffe-Holden. I bring up these representatives and qualifications to merely state that we are well aware of how critical and important it is to have these bandwidths maintained. We were fortunate to have missed the previous restriction and purchased equipment that was already adjusted. That will not be the case if things change now.

I 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.

I appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,



Andrew S. Johns  
Technical Director  
Michael D. Eisner Center For The Performing Arts  
Denison University