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Received & Inspected

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FCC Mail Room

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary

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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 South Salem High School, located in Salem, Oregon, that provides approximately 4 performances per year to 3,500-7,000 audience members and education programs to 2,000 students yearly, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

The South Salem High School Theater Department and Theater Program seek to:

Enrich, engage, inspire, entertain, empower, and challenge performers and audiences with theatrical productions that range in genre, form, and era, from the classics to new works;
Provide a variety of educational opportunities for students from diverse backgrounds;
Train and support the next generation of theatre artists and technicians;
Nurture and develop leadership skills, teamwork, self-confidence, and mentoring relationships in a hands-on, collaborative environment;
Provide arts education programs that promote life-long learning to a diverse community;
and to celebrate the essential power of the theatre to illuminate our common humanity and enhance our understanding of ourselves and others.

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Nationally Honored as A School of Excellence

I 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.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

Please provide the following information in narrative form as completely as you can. Please tell the story of your organization's use of wireless microphones and the importance of wireless devices to your operations:

South Salem High School currently utilizes 8 in the low UHF spectrum and 3 units in the high UHF spectrum. Are usually utilize anywhere from 4-18 wireless mics(the extra being either rented or borrowed). We also use wireless mics for our academic presentations and musical performances. Our theater technicians use a wireless headset system to facilitate safety and cueing for performances and events held in the theater. This includes use for play and musical productions, for all school concerts and events scheduled in the theater, and use by outside vendors that is staffed by our technicians. All of our systems are currently analog and we don't currently have any digital systems. The systems we use tend to have a rough life expectancy of around 5 years, with some lasting longer or shorter amounts of time.

We use:

- microphones
 - in-ear communications (IFBs)
 - cue and control devices
 - equipment controlling devices (not transmitting sound)
- We use 3-8 in-ear communication devices and 2-18 wireless microphones per production.
- We make use of these 2 - 5 times per year for mainstage productions; in-ear communication devices are used 3-6 times monthly for additional events beyond the production season.
- We use the following bands and channels:
 - VHF (channels 2-13, 54 MHz to 216 MHz)
 - Low UHF (channels 14-36, 470 to 608 MHz): 8
 - High UHF (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz): 3
- Following the move out of the 700MHz band in 2010, we purchased 6 new wireless microphones to align with the new requirements. 3 of those would be affected by this process. The cost for those totalled over \$2,200. We work in partnership with another theater program and share equipment; they purchased 16 new microphones following the 2010 shift. We are working primarily with students who are struggling to understand

how to use the equipment in a timely manner and to maintain it; the challenge with retuning and shifting out equipment we are no longer able to use is daunting.

- We work with Michael McIntosh of McIntosh Pro Audio and with Joel Kinney of Apex Pro Audio in aligning our equipment; both of these sound technicians and engineers have over 50 years combined experience in sound and audio work.

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. Educational institutions and professional performing arts organizations 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.

Besides education, school theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21st century skills, such as creativity and collaboration. 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 schools and performing arts organizations 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,



Julianna Gibbons,
Drama Director and Technical Director
South Salem High School