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FCC Mail Room

December 31, 2014

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Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Court Theatre, located in Chicago IL, I write with concern about protection for our wireless microphones and backstage communications devices. Established in 1955, Court Theatre is the professional theatre in residence at the University of Chicago. Our mission is to create innovative productions of classic plays that are thought provoking, character-driven, and thematically enduring. Through main stage productions, audience enrichment programs, and collaborations with the University of Chicago, we re-examine, re-envision, and renew classic texts that pose enduring and provocative questions that define the human experience. We present approximately 200 performances a year to 36,000 audience members and provide education programs to 4,100 students. We employ 275 professional artists, technicians and administrators annually.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and

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also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Our specific uses of wireless equipment are as follows:

We use 12 Shure ULXS4 wireless microphones, 8 in-ear units (half are Shure PSM200, the other half are HME Pro850). In a typical performance, we use around 5 wireless mics and 2-3 wireless intercom units. Everyone one of our XX performances uses at least 3 wireless devices, and can employ as many as 20.

We use both low UHF and high UHF channels, from the low 500s to the high 600s. Our wireless microphones can tune up to 1400 frequencies. None of our equipment falls outside of the TV bands.

All of our equipment is analog. We own the majority of our equipment. On occasion we supplement our inventory with rented Shure ULXD4D units as needed.

A reasonable life expectancy for our wireless equipment is 7 years for microphones, 10 years for in-ear units, and 5 years for intercom.

Moving out of the 700 MHz band required that we replace our entire wireless intercom system. (We were previously using the Telex Radiocom 615-760). It cost us \$3500 to purchase used equipment with an anticipated remaining lifespan of 3-5 years. After that we expect to have to invest upwards of \$10k to replace the system.

In order to move out of the 700 MHz band, it took several days to retune all of the equipment that could be moved to another band. It took another year for us to raise the funds in order to purchase replacement equipment for the items that could not be re-tuned.

To ensure that wireless microphone users transition to new equipment, non-profit arts organizations such as ours need significant financial underwriting in the forms of buy-back programs or grants to make replacing equipment possible. The quality and lifespan of equipment is considered very carefully when we make a purchase, and to have the FCC essentially legislate our equipment out of use places a significant financial burden on vulnerable arts organizations and/or leaves them in danger of being in non-compliance.

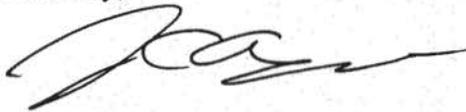
Moving entirely out of the TV band presents a very significant investment in equipment for us and one that we would not be able to make without financial underwriting. Discontinuing use of our current equipment without replacing it would cause a significant, measureable detrimental effect to the quality of the performances we present.

# COURT THEATRE <sup>CELEBRATE</sup> 60

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, 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 theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Jennifer Gadda  
Production Manager  
Court Theatre