

WAPPINGERS

Central School District



Member

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MRS. BONNIE KING, PRINCIPAL



Middle States Association
of Colleges and Schools

January 14th, 2015

Dear FCC,

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

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

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

On behalf of John Jay Proscenium at John Jay High School in Fishkill, NY, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

John Jay High School presents approximately two to three public performances a year, with more than 2,000 attendees annually. Our school theatre program relies on the revenue generated in these performances to sustain and grow our in- and after-school theatre education opportunities for all of our 2,000 students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

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 school and

thousands of others 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 are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

- What type of wireless devices do you use?
 - Behringer UHF Wireless lavalier Microphones
- How many units do you use in a typical presentation or performance? 12-16 units
- How frequently do you offer presentations that use wireless devices? Frequently. The devices are often used in presentations, school concerts, and other formats.
- What bands and channels do you use?
 - High UHF (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz)
 - Are your microphones able to tune to more than one frequency? Yes
 - How wide is their tuning ability? 650-685 MHz
 - Which of your devices are outside the TV bands? What frequencies do they use?
- Which of your wireless devices are analog and which are digital? All are analog
- Do you own or rent your wireless equipment? Own
- For equipment that you own, what is its reasonable life expectancy? 3-5 years
- How did you handle the move out of the 700 MHz band? Did not affect our current wireless devices
 - How much did it cost? N/A
 - How long did it take for you to retune or replace all of your devices? N/A
- What can the FCC do to ensure that wireless microphone users transition to new, more efficient devices to the full extent possible? A reimbursement program for microphones submitted in the newly regulated ranges would provide a great incentive for programs to fully switch from UHF wireless microphones to newer, digital systems that would be free from interference.
- What would persuade you to move out of the TV band? Incentivized programs to allow for educational settings to change over to newer wireless so that students clubs and activities will not be hampered for the profit of corporations.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students and providing pride, entertainment, and dialogue in the

communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,

Kenneth J. Tornatore
Social Studies Teacher/Sound Advisor
John Jay Proscenium
John Jay High School