



Lake Oswego High School

Cindy Schubert
Principal

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Brigham Baker
Athletic Director

1/7/15

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 Lake Oswego High School in Lake Oswego, Oregon, 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. Our School presents 16-18 public performances a year, with more than 7000 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 1200 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.



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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:

[The FCC is seeking the following information from performing arts organizations and educational institutions; answer as many questions as you can, with accuracy and insert the information here in narrative/bullet form:

- What type of wireless devices do you use?
 - microphones
 - in-ear communications (IFBs)
 - equipment controlling devices (not transmitting sound)
- How many units do you use in a typical presentation or performance? 10-30
- How frequently do you offer presentations that use wireless devices? 4-8 times a year
- What bands and channels do you use?
 - 614 MHz to 698 MHz)
 - Are your microphones able to tune to more than one frequency? yes

- Do you own or rent your wireless equipment? A little of both
- For equipment that you own, what is its reasonable life expectancy? 10 to 15 years
- How did you handle the move out of the 700 MHz band? We had to buy a whole new system.



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- How much did it cost? \$18000.00

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,

Bob McGranahan
LOHS Drama