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January 15, 2015

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Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, D.C. 20554

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

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

On behalf of Kansas City Repertory Theatre, located in Kansas City, Missouri, that provides approximately 225 performances a year to 463,579 audience members since our 2009-2010 season and education programs to 10,000 students [The mission of our theatre is that Kansas City Repertory Theatre pursues *theatrical excellence* and advances the art form, creating and sharing stories at the center of the nation's *creative crossroads*. KC Rep cultivates passionate audiences, artists, and advocates who are invested in our region's creative future. We *build community* by connecting people through productions and programming that educate, entertain, challenge and inspire. The vision of KC Rep is that Kansas City Repertory Theatre is the heart of a great theatre town.] I write with concern about protection for our wireless microphones and backstage communications devices.

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

Kansas City Repertory Theatre uses Wireless Hand Held mics and Body Mics (554-590 MHz) TV Band 33 as well as Wireless Comm (TX 518-536 MHz, RX 668-686MHz) TV Bands 23-24, 47-49 with controlling devices RC4 2.4GHz, ISM Band, WIFI Routers 2.4GHz, Motors (2.4 and 5GHz). We typically use 4-20 units per performance (depending on how many performers are in each production) with 8-

10 performances weekly from August through May. While we do not use any VHF channels, we do use Low UHF channels 23, 24 and 33 as well as HIGH UHF channels 47-49.

Our units are able to tune to more than one frequency with a tuning ability as wide as 36MHz. A few of our units are outside the TV Bands and use 2.4GHz ISM Band. All of KC Rep's units are analog and we own all of our wireless equipment. Reasonable life expectancy per unit is 12-18 months. Making the change out of the 700 MHz band cost our organization \$15,000.

We believe the FCC could ensure that wireless microphone users transition to new, more efficient devices to the fullest extent possible if they stopped selling frequencies or if they offered grant money to organizations like the Rep to make the requested upgrades.

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,

A handwritten signature in black ink, appearing to read "Angela Lee Gieras". The signature is fluid and cursive, written over a light blue horizontal line.

Angela Lee Gieras
Executive Director