

14-166

These comments are in response to the February 4, 2015 filing by Shure Incorporated. My name is Kyle Hartigan and I am a Part 74 Licensee – call sign WQRJ266. My job and my company, Eleven Eight Sound LLC, is highly dependent on the use of wireless microphone transceivers. While I agree with some of Shure’s comments, I strongly disagree with others. I agree that, the Part 74 users are still reeling from the loss of the 700 spectrum. For an audio mixer, the complete loss of an asset such as a wireless transmitter/receiver set represents both the loss of a revenue stream, but also the loss of the investment. A professional mixer is often required to maintain \$30,000 to \$50,000 worth of Part 74 equipment. In the 700 spectrum loss, not only did the FCC prohibit the use of devices in this spectrum, but it also prohibited the sale, offer for sale, or shipment within the United States. To me, it is unclear how this does not represent a “taking” by the government; one that warrants compensation.

At a minimum, a typical audio mixer would be facing \$5,000-\$10,000 in reblocking fees to change to a legal frequency, provided the manufacturer offered that service and, it was an available option for my equipment. However, notwithstanding the economic burden, I would be breaking the law, merely by shipping the devices to the manufacturer.

If reblocking was not available, or not technologically possible, the loss of a \$30,000-\$50,00 investment would likely result in severe economic distress, if not bankruptcy. One of Shure’s proposals would likely ensure this outcome.

Shure proposes a 50mW power limit on wireless devices. Given that is far below the 250mW power allowance for current Part 74 users, devices engineered to transmit at 100 or 250mW would likely require additional and cost-prohibitive changes beyond the already substantial reblocking fees. **I urge the Commission to disregard Shure’s reckless proposal. Instead, I recommend Commission to maintain the 250mW limit on UHF devices.**

Finally, I urge the Commission to set aside revenue from any subsequent 600 spectrum auctions to compensate individuals who own devices that operate in the 600 spectrum (or to subsidize manufacturers who offer reblocking services for these devices).

Thank you for your consideration.

Kyle Hartigan