

February 26, 2015

Re: Proceeding Filing #14-166

To Whom It May Concern:

These comments are in response to the February 4, 2015 filing by Shure Incorporated.

I am a licensed Part 74 Licensee (Call sign WQSV749). My livelihood is 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 a sound mixer, the complete loss of an asset such as a wireless transmitter/receiver set represents not only the loss of a revenue stream, but also the loss of the investment itself. A professional sound mixer is often required to maintain \$30 to \$50,000 worth of Part 74 equipment, and in many instances, more.

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. Without adequate compensation from the government for replacement cost of new, legal equipment, the removal of such a spectrum out from under the metaphorical noses of professional sound mixers is and was equivalent to theft. There was no 'grandfather clause' for people who purchased the equipment prior to the removal, and so many thousands of people lost many thousands of dollars.

At a minimum, a typical audio mixer would be facing \$5-\$10,000 in re-blocking fees to change an existing wireless microphone transmitter / receiver set to a legal frequency, provided the manufacturer offered that service and, it was an available option for said equipment. However, notwithstanding the economic burden, I would be breaking the law, merely by shipping the devices to the manufacturer – this is where the details of the spectrum removal become extremely problematic and costly for an existing wireless microphone user.

If re-blocking was not available, or technologically possible, the loss of a \$30-\$50,00 investment would likely result in severe economic distress, if not bankruptcy and a failed, closed business. The economic implications of businesses closing which enable films, television, online videos, commercials and other media to be made on a professional level is staggering and should be considered when making your decision. Note that an individual professional sound mixer may make between \$75,000 - \$200,000 per year, but that mixer enables millions of dollars of high end projects to be completed successfully. Let me be clear when I say the following:

One of Shure's proposals would likely ensure the immediate financial distress of existing wireless microphone users, and the possible bankruptcy of multiple businesses as a result.

Specifically:

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 re-blocking fees.

I respectfully urge the Commission to disregard Shure's selfish proposal (it is still unclear why they would encourage such a detrimental limit on wireless microphone transceivers).

Instead, I urge the Commission to maintain the 250mW limit on UHF devices. In addition, I urge the Commission to raise the limit of VHF devices to 250mW as well.

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 re-blocking services for these devices). Note that if something is taken from Part 74 end users without fair and adequate compensation to replace or update what is taken, that is equal to theft!

Thank you for your consideration.

José Frías  
Production Sound Mixer  
Call sign WQSV749