

March 3, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Comments: Promoting Spectrum Access for Wireless Microphone Operations, GN Docket No. 14-166; Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's Rules, 47 CFR § 1.1206(b), Shure Incorporated ("Shure") submits this *ex parte* communication to clarify comments filed on February 4, 2015, in the above-referenced proceedings ("Shure Comments").¹ Specifically, this *ex parte* clarifies Shure's position on maximum output power levels for Part 74 wireless microphones operating on a secondary basis in UHF broadcast television frequencies from 470 MHz through 698 MHz.²

Section VIII(A)(1) of the Shure Comments contains ambiguous language that may create confusion about the level of maximum output power Shure supports for UHF wireless microphones currently operating under Part 74 rules. Shure does ***not*** support rule amendments that would reduce the existing 250 mW maximum output power limit for UHF wireless microphones. Wireless microphones have successfully operated with up to 250 mW of output power in UHF broadcast television frequencies pursuant to Part 74 rules for many years. There is no technical or policy justification for a reduction in the permissible output power of such microphones.

¹ *In the Matter of Promoting Access for Wireless Microphone Operations, et al.*, GN Docket Nos. 14-166, 12-268, Comments of Shure Incorporated (filed Feb 4, 2015) ("*Shure Comments*").

² Shure recognizes that the pending 600 MHz Incentive Auction will affect the placement of the upper edge of the UHF broadcast television band.

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To avoid further misunderstanding, Shure's clarified position with respect to the maximum power limits of VHF and UHF wireless microphones operated under Part 74 rules is as follows:

- Shure continues to support a 250 mW maximum output power level for UHF wireless microphones.
- Under Part 74 rules, VHF and UHF wireless microphone output is presently measured as conducted power at the antenna input. For wireless microphone products with detachable antennas, Shure continues to endorse the measurement of conducted output power at the antenna input. For VHF and UHF wireless microphones with embedded antennas that cannot be detached or otherwise removed, Shure urges the Commission to permit the measurement of maximum output power as effective radiated isotropic power ("EIRP") at the antenna output. This revision in the measurement of maximum output power will allow wireless microphone manufacturers more flexibility in the design of new devices that may be form factor limited with small embedded antennas without in any way increasing the risk of interference to other services.
- Shure continues to support a 50 mW maximum output level for VHF wireless microphones, but urges the Commission to permit measurement of output power as EIRP at the antenna output for devices with embedded, non-detachable antennas.
- If VHF wireless microphone power continues to be measured exclusively on a conducted basis at the input of the device's antenna, Shure supports a revised 250 mW maximum output level for VHF devices.

Shure appreciates and values the hard work being undertaken by the Commission in its ongoing review of wireless microphone operations within the broadcast television bands and in new supplemental spectrum. To the extent the Commission has any questions regarding this *ex parte* communication, please contact the undersigned.

Respectfully submitted,

/s/

Catherine Wang
Timothy Bransford

Counsel for Shure Incorporated