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Electronically Filed

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

Re: Future Frequencies for Wireless Microphones
ET Docket No. 14-165
GN Docket No. 14-166
GN Docket No. 12-268

Dear Ms. Dortch:

CP Communications, LLC ("CP") wishes to respond to a letter filed on July 10, 2015, in the above-captioned proceedings by CTIA, The Wireless Association®. While CP appreciates CTIA's statement that it recognizes the role played by wireless microphones in public events and news reports, CTIA's position that the Commission should refrain from making the 1.4 GHz band available to microphones is inconsistent with that professed recognition. In effect, CTIA is asking the Commission to complicate further the task of meeting the widely accepted need to accommodate wireless microphones because of the mere possibility that international spectrum studies might move in the direction of commercial wireless use of that band at an unknown time in the future.

CP is a leading source for the rental of wireless production equipment -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing -- to the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP also sets up, manages, and supervises the operation of wireless equipment for its customers. CP's systems, both licensed and unlicensed, make extensive use of the UHF television band.

CTIA's claim that allowing wireless microphones to use the 1.4 GHz band would in effect expand spectrum available for microphones from only 12 MHz to 90 MHz is misleading at best, because it assumes that two UHF TV channels reserved for wireless microphones are the only available spectrum, and it also assumes that the Commission would give microphones exclusive use of the entire 1435-1525 MHz band. Neither assumption is correct.

Wireless microphones currently have access to most of the UHF television band, albeit on a secondary basis to television broadcasters. The spectrum that microphones can use without interference varies from one geographic location to the next; and engineering the deployment of hundreds of microphones at large events and venues is a sophisticated engineering job accomplished every day by skilled professionals, including employees of CP. In effect, if the TV band is truncated by from 84 MHz to as much as 144 MHz, that is how much spectrum will soon be taken away from wireless microphones, not the 12 MHz stated by CTIA. Moreover, at the same time that wireless microphone technology and miniaturization were improving dramatically, and the amount of microphone use mushroomed, the Commission truncated the TV band by removing channels 52-69, resulting in a loss of an additional 108 MHz. Thus the total spectrum loss for wireless microphones is not 12 MHz but more like 192-252 MHz, a loss of some three-quarters of the spectrum that was available just a few years ago.

Likewise, CP does not expect that wireless microphones would gain exclusive access to the 1435-1525 MHz band. That band is already used for flight testing and other purposes, and band use is carefully coordinated. Thus it is equally misleading to suggest that allowing access to the 1.4 GHz band would give wireless microphones an additional unencumbered 90 MHz.

Given how much spectrum is about to be repurposed for commercial wireless use in the 600 MHz band, CTIA's approach borders on simply grabbing whatever it can and telling everyone else to get out of the way. CP wants to make sure that the Commission recognizes the misleading implication of CTIA's 12 MHz vs. 90 MHz argument.

Respectfully submitted,



Peter Tannenwald

Michelle A. McClure

Counsel for CP Communications, LLC

cc: (by e-mail)

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