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Via Electronic Filing

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

Re: GN Docket Nos. 12-268 and 14-166 and ET Docket No. 14-165
Ex Parte filing of Sennheiser Electronic Corporation

Dear Ms. Dortch:

Today, the undersigned discussed by telephone, in separate conversations with Jessica Almond, Legal Advisor to Chairman Wheeler, and Valery Galasso and Johanna Thomas, Legal Advisors to Commissioner Rosenworcel, the following:

- Many microphone applications can operate in ranges outside UHF, but some cannot. Access to UHF channels must remain available long term for wireless microphone use. Manufacturers invest years developing equipment and professional users spend tens to hundreds of thousands of dollars in equipment that is expected to last for 15-20 years. Prudent public policy dictates that no further spectrum transitions occur in the foreseeable future.
- Certain wireless microphone operations in UHF, such as breaking news, require at least one fast-polling channel shared with WSDs that polls significantly faster than 20 minutes.
- Co-channel operations in UHF will be vitally important to professional wireless microphone users and any rule changes that facilitate better co-channel use should apply

to UHF, not just VHF. A -80 dBm field strength benchmark should be adopted in lieu of a specified (4 km or other) separation distance.

- Wireless microphones using UHF should not be regulated like white space devices. Database control of wireless microphones would reduce reliability, disrupt established work flow methods, add complexity to equipment design, and be logistically difficult because microphones are often operated indoors where GPS may not be available.
- Unlicensed wireless microphone users that are civic and arts groups engaged in professional performances – symphonies, operas, ballet companies, theaters, etc. – must have access to the same database registration protection as Part 74 licensees.
- The FCC should grandfather equipment currently in the field that, post-repacking, can tune to lawful UHF frequencies. Professional wireless microphone users seek clear spectrum and, through a variety of readily available spectrum analysis tools, will avoid other users, as they have done for decades.
- New spectrum in 941-960 MHz and 1435-1525 MHz will be insufficient to replace the loss of UHF spectrum. Coordination around incumbents in 941-960 MHz can be accomplished by requiring accurate documentation of their locations in ULS. The Commission must adopt coordination procedures for the 1435-1425 MHz band that are reasonably streamlined and predictable, so that wireless microphones have access to the band in a timely manner when needed. The Commission also should provide access to 2020-2025 MHz for professional level (*i.e.*, non-hobbyist) wireless microphone users.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/

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