

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum through Incentive)	
Auction)	

To: The Commission
(Filed electronically through ECFS)

COMMENTS OF CP COMMUNICATIONS, LLC
RE PETITIONS FOR RECONSIDERATION

1. CP Communications, LLC (“CP Communications”), hereby submits these Comments supporting Shure Incorporated’s Petition for Reconsideration¹ in the above-captioned proceeding as it relates to frequency coordination procedures and also those comments filed by equipment manufacturers as relates to the emission mask in the 1.4 GHz band.

2. CP Communications has a significant stake in the rules adopted in this proceeding, because it is a leading source for the rental of wireless production equipment that is subject those rules -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing. CP Communications’ customers include the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. CP Communications owns and

¹ Petition for Reconsideration, *In the Matter of 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, filed December 17, 2015.

operates wireless microphones in the 500 and 600 MHz bands and holds licenses for wireless microphones under Part 74 of the FCC's Rules. The Company's business is highly specialized, requiring hardware and skills that lead most high-level professional users to contract with outside vendors. Only a handful of companies offer these services, but their services are critical to the activities of their customers. They are called upon to configure and operate the most complex systems – those beyond the expertise of even broadcast customers – and are on the “front lines” when it comes to finding and efficiently using spectrum and applying the Commission's Rules in actual practice.

3. In other words, CP Communications has a very strong stake in how the Commission deals with wireless microphones, because it is the entity that has to solve the problem of finding enough frequencies for the microphone configurations that its customers demand.

4. CP Communications understands Shure Incorporated's concern the AFTRCC coordination process could become unworkable in the future due to the volume of requests from scores of different users. CP Communications has great appreciation for the efforts of AFTRCC, has a good working relationship with AFTRCC, and successfully utilizes the existing coordination process.

5. CP Communications also supports the wireless microphone manufacturers in their concerns relating to the proposed emission mask. While CP Communications itself is not a manufacturer, it is familiar with the design of the products it uses and works with manufacturers to achieve the most useful equipment designs. CP Communications concurs with the position of the wireless microphone manufacturers that the proposed emission mask is unworkable with respect to overall equipment design, cost, and performance. The adopted mask was not proposed

in the Notice of Proposed Rulemaking and would have drawn significant adverse comment had it been proposed.

Respectfully submitted,



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