

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

In the matter of:)	
)	
Unlicensed Operation in the TV)	ET Docket No. 04-186
Broadcast Bands)	
)	
Additional Spectrum for Unlicensed Devices)	ET Docket No. 02-380
Below 900 MHz and in the 3 GHz Band)	
)	

November 29, 2004

COMMENTS OF
International Communications Industries Association, Inc.

The International Communications Industries Association, Inc. (ICIA) is over 65 years old and has among its members over 200 audio companies many of which provide wireless microphones. ICIA serves its worldwide membership and the AV communications industry as the pre-eminent provider of education, exhibitions, and information services to enhance their ability to conduct business successfully, profitably and competently. ICIA's total membership is made up of over 3,000 companies and individuals located in 56 countries, representing tens of thousands of AV communications professionals. ICIA is somewhat different than most trade association in that we are not just a manufacturer or dealer association; instead we include these two groups along with independent design consultants, rental and staging companies, and technology managers from the government and military, higher education, corporate, medical, religious, IT, and other vertical markets that buy from the manufacturers and dealers.

Among its other audio manufacturers, ICIA's membership includes six of the leading manufacturers of wireless microphones and other wireless audio systems that collectively represent over 80% of the U.S. market for wireless microphones (study done

by the Professional Audio Manufacturers' Association, PAMA). These companies are AKG Acoustics of Nashville, TN; Audio-Technica U.S. of Stow, Ohio; Sennheiser Electronic of Old Lyme, CT; Shure Incorporated of Niles, IL; Sony Electronics of Park Ridge, NJ; and Telex Communications of Burnsville, MN.

PAMA in correspondence to the FCC by Paul Galo has stated well the issues that wireless microphone companies face if the recommendations in FCC ET Docket No. 04-186 are implemented without providing adequate protection for wireless microphones and other wireless audio systems. ICIA will not repeat those concerns here, but it does want to emphasize that it agrees strongly with PAMA's position. However, ICIA would like to take this opportunity to illustrate the many and varied applications of wireless microphones to demonstrate the possible far-reaching effect on the American public of the suggested changes.

Today's communication environment is surrounded by sight and sound to the point where the listener and viewer feel immersed in communication. It is this powerful environment of connected and coordinated technologies that we have all grown to expect. Meeting and conference rooms today have sophisticated sound systems, video projection, videoconferencing and audio conferencing, streaming media, and other communications tools. Our houses of worship now use the same mix of technologies to better communicate their message. Teaching and learning in schools and higher education is a multimedia environment where teachers and students use these new technologies daily. Command and control centers are at the focal point of military, government, and corporate operations and they are based on these same communications tools. This list of types of institutions and applications is near endless as the US private and public sectors work daily to improve their communication effectiveness.

Wireless microphones are a crucial component of this communication infrastructure. No longer are presenters tied to a podium, entertainers restricted by a cord, audiences made to walk to a microphone, or panel members huddled around a tethered microphone. And, this is not just a matter of convenience; it is a matter of effectiveness. A decline in the effectiveness and availability of wireless microphones will create a negative effect on today's and tomorrow's communication environment.

ICIA's position is made in light of all of our members. Of course our manufacturers and dealers are interested, but so to are our technology managers. These people work everyday in many different industries and organizations to employ technology to improve communications. They, and the rest of the AV communications industry, need to continue to use wireless microphones and other wireless technologies to serve the American public.

Respectfully submitted,

International Communications Industries Association, Inc.

A handwritten signature in black ink, reading "Randal A. Lemke". The signature is written in a cursive, flowing style with a large initial "R".

Randal A. Lemke, Ph.D.
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