



COVENANT LIFE
CHURCH

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VIA ELECTRONIC FILING

Chairman Kevin J. Martin
Commissioner Jonathan S. Adelstein
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Comments of [LARGE WORSHIP HOUSES].

Introduction of Unlicensed Devices in the "White Spaces"
ET Docket Nos. 04-186, 02-380

Dear Chairman Martin and Commissioners Adelstein, Copps, McDowell, and Tate:

The undersigned large-scale house of worship, representing thousands of congregants are gravely concerned that the Federal Communications Commission's actions in its "White Spaces" proceeding will result in harm to wireless microphone operations that we rely on to communicate our spiritual message effectively and keep up with the demands of our membership. We strongly urge the Commission *not* to permit new mobile electronic devices to operate on frequencies currently used by wireless microphones or otherwise to take steps that would risk interference to the sophisticated audio systems prevalent in today's modern houses of worship. Should the Commission decide to allow new devices to operate on these frequencies, the Commission should follow the recommendations of the Institute of Electrical and Electronics Engineers ("IEEE") and, in particular, not allow new devices to operate on channels adjacent to assigned TV channels and some modest number of channels in rural areas.

We are just one of several of the larger houses of worship in this country who have a weekly attendance in the thousands. We are always looking for new ways to communicate our message and, like most other large worship facilities in this country, we have embraced high-quality audio technology to enhance and energize that goal. Wireless microphone technology is a key part of that development. Our audio systems, including wireless microphone systems, enable us to serve our congregation effectively and seamlessly, enabling more complex musical arrangements and congregational interaction without distracting from our message. In addition, our house of worship has unique and intricate architectural properties that make wired

microphones difficult to integrate. Thus, through the use of wireless microphones, we are able to stay culturally relevant without affecting the purpose for which we exist.

Today, audio systems for large-scale houses of worship are no longer the simple speech reinforcement systems prevalent a few decades ago. Many facilities have full concert quality multi-media systems necessary to support worship leaders, live sermons, choirs, prayer teams, praise bands and orchestras and special theatrical productions. The largest facilities have footprints larger than multiple football fields and hold pew-seating for thousands of worshipers. Typical facilities may include a large stage for the pastor, and stages to accommodate hundred-person choirs, full orchestras, praise teams, a praise band, and complex sound systems. Our experienced technical staffs devote considerable time and effort in planning to ensure high-quality productions including interference-free wireless microphone operation. This technology allows us to regularly broadcast, publicly or privately, to other members and participants not able to attend in person. It is not uncommon for a large house of worship to invest hundreds of thousands of dollars in a high-quality audio and video system comprised of huge sound boards, many wireless microphones and video cameras, and a theatrical lighting system. By making these investments, we have been able to provide live broadcast quality audio and video sometimes surpassing the technology used by many major TV network productions.

Today, there is no reliable technology that can protect existing services from what would be crippling interference from new portable devices. It is already extremely challenging for our technical staff to find sufficient available channels to support our house of worship programs. Introduction of new mobile electronic devices on these frequencies would make our programming virtually impossible and we therefore ask that the Commission *not* allow new personal portable devices to operate in the TV spectrum. If the Commission decides to allow new equipment to use these frequencies, the Commission should follow the technical recommendations of the IEEE 802.22, the well-respected engineering group that has carefully studied this issue. In particular, we support rules that would prohibit new devices from operating on channels adjacent to assigned TV channels and on a limited number of channels in rural areas.

Regardless of the size of the house of worship or type of communications system used, the need for clear, high-quality audio is paramount to getting our message heard, not only to the back of the room, but beyond the walls of the church in outdoor venues and in public and private broadcasts. These communications are important to millions of Americans who attend religious services and to the religious institutions that are a foundation of American society and culture today. We ask that the Commission take this into account in deciding whether and how other equipment should be allowed to operate on the same frequencies as wireless microphones.

Respectfully,



Bob Kauflin

Director of Worship Development for Sovereign Grace Ministries