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FCC Mail Room

FIRST BAPTIST CHURCH

300 West Main Street • P.O. Box 2025
Dothan, Alabama 36302

Dr. Johnny Fain, Pastor

October 22, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Dear Madam or Sirs:

This letter concerns the upcoming changes to our country's wireless microphone frequencies which are being considered by the Federal Communication Commission.

I am Senior Pastor at First Baptist Church of Dothan, AL. Our church, like hundreds of other churches, uses several wireless microphones each Sunday during our services. The changes being considered by the FCC will possibly eliminate our use of wireless microphones. In addition to our wireless microphones, we would not be able to provide our hearing-impaired members with wireless hearing devices. This is unacceptable!

The FCC must set aside at least eight (8) protected T.V. channels for the wireless market. Right now, the FCC plans to set aside only two (2) channels, which will not be sufficient to cover all the organizations in this country using wireless microphones.

We find these changes which will negatively affect our church, as well as hundreds of other organizations, to be totally unacceptable. Please make sure at least eight (8) protected T.V. channels are set aside for the use of wireless microphones and hearing devices.

Thank you very much for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Johnny Fain".

Dr. Johnny Fain

JWF/dc

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THE
RECORDING
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January 31, 2007

VIA ELECTRONIC FILING

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

Re: The National Academy of Recording Arts and Sciences
Comments Regarding the Technical Rules for Unlicensed Devices in the "White Spaces"

ET Docket No. 04-186

Dear Ms. Dortch:

On behalf of our members, The Recording Academy submits this letter in the Commission's Further Notice of Proposed Rulemaking to highlight our serious concerns regarding the technical rules for unlicensed devices in the broadcasting "white spaces" and to urge the Commission to include wireless microphone operations in its test program. The National Academy of Recording Arts and Sciences is an organization of musicians, producers, engineers and other recording professionals. Internationally known for the GRAMMY Awards, The Recording Academy is responsible for groundbreaking professional development, cultural enrichment, education and human services, and advocacy.

Among the Academy's thousands of members, are touring professionals who rely on current wireless mic technology to deliver a quality concert experience for their fans. In addition, our membership consists of a Producers and Engineers Wing, which was established expressly for producers, engineers, remixers, manufacturers, technologists and other related creative and technical professionals in the recording community. Both of these communities, as well as our GRAMMY telecast and similar programs, would be adversely affected by an introduction of unlicensed devices into the spectrum currently used by wireless mic technology.

The Commission's plan to integrate unlicensed devices into spectrum where numerous incumbents already operate is unprecedented in scale and scope. Moreover, the Commission's preliminary plan to avoid interference between incumbents and new devices relies almost exclusively on completely untested technology. We urge the Commission to proceed with an abundance of caution as it prepares to initiate laboratory and field testing of new unlicensed devices in anticipation of establishing final rules and certification standards. The Commission should only proceed to draft final technical rules for the "white spaces" after comprehensive testing demonstrates that unlicensed devices are not a threat to incumbents, including wireless microphones. To do otherwise would harm incumbents and new users alike.

The Recording Academy also reminds the Commission that while broadcast television stations are the most visible incumbents in the "white spaces," there are a number of other incumbents that play critical roles in the broadcasting, music, and entertainment industry, and must be protected by the Commission's technical rules. In particular, wireless microphones and other low-powered auxiliary

Office of Advocacy & Government Relations

529 14th Street, NW • Suite 840 • Washington DC 20045
(202) 662-1285 • Fax (202) 662-1342 • email: Washingtondc@grammy.com

broadcasting devices ("wireless mics") have become indispensable tools for broadcasters, recording artists and live entertainers, and are now a fundamental part of the audio equipment routinely used for real-time communications throughout the entertainment and other industries.

Wireless mics are sensitive precision instruments that could be rendered unusable if they become subject to increased interference from new unlicensed devices in the "white spaces." When the Commission crafts its technical rules please consider events like the GRAMMY Awards, televised sporting events, and Broadway musicals. Without exception, these events would not be accessible to the American public in their current formats without wireless mics. If unlicensed devices proliferate in the "white spaces" without comprehensive protection for wireless mics, these events will be threatened. Imagine the GRAMMY Awards with sporadic disruptions in the audio broadcast due to interference from unlicensed devices. Similarly, imagine audio disruptions affecting the Super Bowl telecast or World Series, or the audio failing during the opening act of a major musical production. If the Commission opens the "white spaces" spectrum without adequate protections for wireless mics, problems of this magnitude become possible, if not likely.

The Commission can avert this outcome by incorporating wireless mics into its test program from the beginning. The Commission's rules must be based on test data that accurately reflects how proposed technology solutions, such as smart radios, will be able to avoid interference to wireless mics, as well as higher powered broadcast services. The manufacturers of unlicensed devices assert that "smart" technology is a complete interference avoidance solution, but to date they have done little to substantiate the assertion. Over the coming months they must be required to demonstrate that "smart" technology is more than vaporware in laboratory and field tests conducted at the Commission's laboratory, as well as by third parties. Such testing needs to be designed to reflect real world interference conflicts between incumbent and unlicensed devices.

The Recording Academy also urges the Commission to draft comprehensive rules that satisfy its publicly stated obligation to protect all incumbents in the "white spaces." Due to their low power and sensitivity, it is important that new rules expressly provide for wireless mic protections. These rules need to be strict and comprehensive, and must be effectively drafted when initially promulgated. It is widely anticipated that the manufacturers of unlicensed devices will widely market and sell as much new unlicensed device equipment as possible shortly after they receive the approval to sell devices. Once unlicensed devices are introduced into the stream of commerce, there will not be a meaningful opportunity to correct or strengthen ineffective rules. Of course, after-the-fact remedies, such as the right to complain about interference to the FCC, are meaningless because the damage -- disruption of a live performance or broadcast -- will have already been done. Stringent and effective technical rules will literally be the only line of defense against interference from unlicensed devices to the live broadcast of the GRAMMY Awards, live concerts and other nationally televised events.

Therefore, The Recording Academy urges the Commission to proceed with caution in developing new rules for unlicensed device operations in the "white spaces." If the Commission opens this spectrum without adequate protections for wireless mics, the harmful interference caused by unlicensed devices could have a dramatic effect felt throughout the broader cultural industry.

Sincerely,



Daryl P. Friedman
Vice President, Advocacy & Government Relations

Office of Advocacy & Government Relations
529 14th Street, NW • Suite 840 • Washington DC 20045
(202) 662-1285 • Fax (202) 662-1342 • email: Washingtondc@grammy.com