

PARROTFISH PRODUCTIONS

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Date: 2-12-2010

VIA ELECTRONIC FILING

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Comments to Further Notice of Proposed Rulemaking
Amendment of Parts 15, 74, and 90 of the Commission's Rules Regarding Low Power
Auxiliary Stations, Including Wireless Microphones
WT Docket Nos. 08-166, 08-167; ET Docket No. 10-24

Dear Chairman Genachowski:

My company, Parrotfish Productions, produces nature/documentary films that serve a wide audience interested in environmental, outdoor, and marine subjects. We have an audience that reaches nationwide, both through broadcast television and cable/satellite outlets. I am writing to you today to ask for your support in protecting currently in-place wireless microphone systems from interference, and to ensure that wireless microphone users will be eligible to obtain FCC licenses.

We own several of these systems and use them for obtaining the audio portion of our videography, as well as for crew communications, IFB (Interrupted Feedback), and live presentation purposes. We are very dismayed to learn that existing systems will need to share previously allocated spectrum with new users on an interference basis. Many of us have invested substantial sums in these systems and are hard pressed to replace them. As existing, legacy users of this spectrum, we need to be protected against potential interference from these new sources and we need to be allowed to license existing systems to permit continued use.

We are asking that the FCC ensure that any rule changes it adopts allow us to obtain an FCC wireless license to continue doing the work that we are doing now. We also ask that we be protected from potential interference from new users. Unlike many companies, we are not a fixed base operator and conduct mainly field operations. We rely heavily on wireless microphone systems to accomplish our work because the nature of our productions finds us in situations where cabled audio recording is either not practical or just plain impossible.

Please make it possible for us to continue to use these wireless microphone systems and to allow existing wireless users to obtain FCC licenses for their systems and protect us from interference from new sources.

If you have any questions regarding these comments, please do not hesitate to contact the undersigned.

Respectfully yours,
Josh Kaye-Carr, Owner
Parrotfish Productions