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February 19, 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:

I have been working professionally in the wireless industry for over thirty years, beginning as a radio surveillance technician for the US Navy Submarine Service. Since that time, I have authored the RF Coordination and Procedures manual for the Olympic Committee which has been used as the blueprint for wireless systems coordination and operation for the Asian and Pan American Olympic Games. I was also the Chief RF Coordinator for the World Cup Soccer games in 1994 for all fifty two games in all nine cities.

I have worked as the Wireless Systems Engineer for the last fourteen consecutive Super Bowls. In this capacity, I have been responsible for clear wireless microphones used for the National Anthem, "God Bless America" and halftime entertainment viewed by millions of people all over the world. There are also multiple backstage wireless communications used for critical life safety-related stage and set piece movement and wireless in-ear monitors for the music artists used on all of these events.

I have also worked as the RF Coordinator for the NBA All-Star and Final games, Latin Grammy and Billboard Music Award shows, and the US Army's Spirit of America events. In addition to these events, I have served as a frequency coordinator for the Society of Broadcast Engineers and have first-hand knowledge of the amount of wireless systems used at large special event television broadcasts.

Although the wireless microphones I encounter most often are used for television broadcasts, the systems themselves are rented through various professional audio companies that may not have call signs nor be eligible for an FCC license. The rental of these systems is based on available products from various manufacturers that operate within particular frequency bands. These units are in turn deployed among many RF devices to fit within an overall spectrum band plan for the particular event.

Wireless microphones have been used in the United States since 1962 in UHF spectrum from 470-806 MHz. Since the FCC has reallocated radio spectrum above 698 MHz and introduced digital television in the United States, we have lost over 40% of the available spectrum that we have had since the introduction of wireless. This reduced spectrum has increased the challenge and complexity of RF coordination at most events, and broadcasters increasingly have to rent wireless systems from multiple professional audio companies to enable clean and clear wireless audio in their productions.

With the looming introduction of new consumer devices in the TV bands, it is imperative that professional audio rental companies be eligible for Part 74 licenses, as it is clear that this equipment will be heard on television broadcasts by millions of Americans.

It is important to note, however, that although many of the productions serviced by professional rental companies are broadcast, many others may not be, and yet these non-broadcast events will utilize the same equipment to fulfill professional audio needs in theaters, civic auditoriums, corporate campuses and entertainment venues. Part 74 licenses for audio rental companies will help ensure that their inventories of wireless audio equipment will continue to function in the manner these important sectors of society have come to expect. In my opinion, if the FCC neglects these and other important uses of wireless microphones and instead forces a large percentage to permanently become Part 15 devices, it will negatively affect many aspects of American culture.

Respectfully submitted,

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