

phil ramone inc

7 TITO LANE
WILTON , CT 06897
Phone: 914-234-6661 Fax: 203-761-8575
E-Mail: phil@philramone.com
Web: philmaone.com

February 24, 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:

During a recording session I was producing for Frank Sinatra in 1992, the artist abruptly stopped the performance and in frustration asked to be freed from the large, cabled microphone on a stand inside the elaborate 360° glass booth we had specially constructed for the session. He wanted to be closer to his orchestra and enjoy the full feeling of a live performance. We were left with only one choice -- to hand him a wireless microphone.

In my 50+ year career in the music industry, I have had the honor to work with the most notable luminaries of the art form, and I have been fortunate to play a role in the evolution and transformation of popular music in both the artistic and technical realms. Always looking for better and more exciting ways to experience music and sound, I have been an ardent supporter of innovations that have propelled the industry forward, such as Hi-Definition Recording, the Compact Disc, Digital Video Disc, Surround Sound, and EDNet distance recording technology. After more than 20 years of producing phonograph records, it was with great pride that I witnessed one of my productions, Billy Joel's "52nd Street," become the first commercially released Compact Disc.

While the innovations in recording have been remarkable, they have been matched in magnitude by technology developments for the stage. Sound and lighting systems for live performance operate on a level unimaginable in the early days of the amplified music concert tour. The impact of today's live music experience is the result of a dizzying array of technical elements that are assembled and operated by extensive crews working long hours to create a concert experience the audience will remember long after the event. Of all the technologies employed on the modern stage, perhaps none has changed the nature of live music like the wireless system.

In the 1970s, wireless microphones were largely the tool of the broadcast networks. But it wasn't long before other parts of the entertainment industry began to take advantage of the benefits they provided. Because even the most basic amplified music performance relies on a microphone, the ability to move freely while performing opened up new avenues for musical artists -- first with vocalists and followed quickly by instrumentalists. The excitement of the concert experience grew exponentially when this freedom of movement became reality. Over the years, wireless audio technology advanced along with the other components of the concert sound system, elevating the overall quality of the audio and visual experience.

The broadcast use of the wireless microphone spurred adoption on the non-televised stage, and now it has come full circle, where the music concert experience is now a highly desired genre of broadcast. Perhaps this is nowhere more evident than on the annual Grammy® Awards telecast, for which I have had the honor to serve as music production supervisor for the past 15 years. The mission of the program is to deliver the Recording Academy's annual awards, but for many viewers, the excitement comes from our industry putting forth the best of its live performers in an all-star concert event.

And while the Grammy Awards and the many other broadcast music performances are vital elements of American entertainment culture, the quantity of these programs pales in comparison to the number of live music performances occurring across the country every day. The venues for these shows are diverse -- from the nightclub to the auditorium, the fairgrounds to the amphitheater. These shows utilize the best of modern sound technology they can provide, and in almost all cases this includes wireless microphones.

I am pleased that the FCC is exploring expanding the classes of wireless microphone users who are eligible for licenses. I believe this initiative is long overdue, and I hope that this re-evaluation will accurately assess the communities that now rely on this vital technology. While music is my passion, sound and technology are my livelihood, and I have observed that the equipment that serves a pivotal function in the production of music also reaches into the spiritual, government and business communities with equal prominence. It is important that each of these classes is carefully considered in any expansion of eligibility. Spoken word or musical performance, the medium is a critical part of the message, and the medium should not suffer interference.

As I understand it, the FCC license stands to take on heightened importance as new services attempt to share the radio spectrum wireless microphone operators have used responsibly for decades. Pioneered by the broadcaster, wireless audio now touches almost every aspect of our lives. We certainly would not want the future to arrive at the expense of the present.

Sincerely,

Phil Ramone

Producer