



March 1, 2010

Chairman Julius Genachowski  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: FCC Proceeding on Licensing of Wireless Microphones  
WT Docket No. 08-166, WT Docket No. 08-167, ET Docket No. 10-24

Dear Chairman Genachowski:

On behalf of Video Equipment Rentals (“VER”), I am writing to give the Federal Communications Commission another perspective on the proposed changes to the FCC’s rules regarding the licensing and operation of wireless audio equipment, including wireless microphones. VER has made its name in the professional audio industry by keeping up with the latest cutting-edge audio and video technologies, and offering to corporations, television and movie producers, and other entities an affordable means of access to world class audio and video production technologies to support their events. It is our understanding that the FCC has already received dozens of letters in this proceeding from a large variety of wireless microphone users. Our goal is to help the FCC understand the ramifications of its proposals on companies like VER, namely rental companies that supply the high end audio and video equipment needs of many of the types of entities that have already sent you letters. We urge the Commission to amend its rules so that rental companies have the opportunity to obtain wireless microphone licenses.

VER has years of experience in handling the wireless audio needs of many of the top studios, conference facilities and production companies in the United States. Not only do we rent the professional wireless equipment ranging from microphones to in-ear monitors required by our customers, but we also offer assessments of their audio needs to support a successful event, provide trained technical and production personnel to operate, manage and troubleshoot the audio systems onsite, and select and coordinate the frequencies used by our equipment. We also offer training to our customers on how best to use the equipment the rent. We provide these services out of our 18 offices throughout the United States.

We have found that in the professional environment in which we operate, our customers require the highest quality wireless experience possible. Our customers -- and their audiences -- expect that wireless sound systems will operate flawlessly regardless of the number of wireless microphones, intercoms and monitors used, the number of channels used, or the complexity of

the event. That is why we have devoted years to our technical training and offer only high end equipment to our customers. However, even if we supply our customers with the highest quality equipment available, the most skilled and experienced sound engineers, and the best event managers, their needs will not be met if we cannot coordinate the frequency bands in which the equipment operates and ensure that there are no conflicting uses within that spectrum.

Frequency coordination can often be a difficult and time consuming process, requiring identification of other competing frequency uses occurring at the same time and location of our customer's event. We can only imagine, though, what nightmare awaits us if we are responsible for finding interference-free channels in an environment where random, unpredictable interference can occur from unlicensed white spaces devices -- devices that could be in the pockets of the event patrons, or nearby concessionaires, or individuals and businesses in the next building or down the street.

The Commission is considering amending its rules so that some wireless microphones operate as unlicensed low power equipment that must accept interference from new devices. Other wireless microphones, however, will be licensed and will receive protection from interference and have more flexibility in their power usage. Under this approach, the only possible way to avoid interference from new unlicensed devices would be to have the wireless audio equipment be given frequency protection through licensing and registration in a geolocation database, and any other safeguards the FCC may afford such licensed equipment. Therefore, we strongly support the FCC expanding the class of entities eligible to receive licenses for wireless audio equipment, and affording these entities frequency protection. While we believe that any entity that needs to use wireless audio equipment as part of its business should be given the ability to obtain a license for its use, it is important that equipment rental companies are specifically identified as having the opportunity to obtain wireless microphone licenses.

We also understand that there is some question as to whether license eligibility should be based on the business purpose or status of the proposed licensee, the size of the venue where the proposed licensee plans to use the equipment, or some other factor. We believe that the best approach would be to limit licensing to professional use not including amateur, recreational uses but stay away from placing artificial limits on what type of user is eligible for a license, or what the size of the venue must be to qualify for a license. There are many venues where wireless microphones may be used, both small and large, indoors and out, that require multiple channels and interference-free operations.

What is more important is the conditions placed upon the professional licensee's operations to ensure that it is technically capable and willing to protect against interference with other licensed devices. Often -- but not always -- it is the rental house technical team that is responsible for all sound operations and will be closest to channel selection and use at a professionally produced event. Rental companies are often the primary source of equipment at an event. In many instances, neither the venue operator, performers, or producers actually own the sound equipment used for their event. (Our professional customers should also be able to license their operations -- some customer obtain equipment from us, but have their own experienced technical team to manage the audio at their event). Even if a venue, artist, producer or owner of an event

also holds an FCC license, the license may not cover the particular equipment or frequency ranges of the equipment that will be used.

Therefore, it is also important that companies which rent equipment like VER should be given the option of obtaining their own licenses. Further, those licenses should not be limited to a particular location as most rental companies service customers in many different locations and it would be impractical and onerous on the rental company, and not particularly helpful to the FCC, to require rental companies to obtain licenses for each location that it serves. Instead, they should be required to undertake the necessary frequency coordination prior to using the equipment, and register the equipment in a geolocation database prior to each use.

Furthermore, the licensing process should be clear, quick and easy and we encourage the Commission to revise its licensing approach to accomplish this. Potential licensees should not be discouraged from obtaining a license due to the complexity of the process. We believe this approach would help maintain an interference-free atmosphere for both wireless microphone users and those operating new white space devices.

If you have any questions, or would like additional information, please feel free to contact me.

Sincerely,

/s/

Brady Belavek  
Video Equipment Rentals

CC: Commissioner Meredith Attwell Baker  
Commissioner Mignon Clyburn  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell