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March 12, 2013

VIA ELECTRONIC FILING

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

Re: *EX PARTE NOTICE*

Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band, WT Docket No. 08-166; Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition, WT Docket No. 08-167; Amendment of Parts 15, 74 and 90 of the Commission's Rules Regarding Low Power Auxiliary Stations, Including Wireless Microphones, ET Docket No. 10-24; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On March 8, 2013, Mark Brunner, Senior Director, Global Brand Management, Ahren J. Hartman, Director, Axient Wireless Engineering and Edgar C. Reihl, P.E., Director, Spectrum Strategy with Shure Incorporated ("Shure") and Catherine Wang and Kimberly A. Lacey of Bingham McCutchen LLP met separately with Charles Mathias, Office of Chairman Genachowski and Erin McGrath, Office of Commissioner McDowell. Mr. Brunner, Mr. Hartman, and Mr. Reihl along with Catherine Wang and Timothy L. Bransford of Bingham McCutchen LLP then met with Alan Stillwell, Paul Murray, Edward Smith, Robert Weller, Jamison Prime, Martin Doczkat, Ira Keltz, Ty Bream, and Stephen Buenzow of the Incentive Auctions Task Force and then attended a separate meeting with the following individuals from the Office of Engineering and Technology and Wireless Telecommunications Bureau: Julius Knapp, Geraldine Matise, Hugh Van Tuyl, Ruth Milkman, Paul D'Ari, Bill Stafford, Matthew Hussey, Jamison Prime and Paul Murray. Finally, Mr. Brunner, Ms. Wang and Ms. Lacey separately met with Courtney Reinhard, Legal Advisor, Office of Commission Pai. In all of these meeting, Shure discussed the issues raised in their Comments filed in the above-referenced Incentive Auction and Wireless Microphone proceedings.

Shure reviewed the wide variety of professional wireless microphone uses in commercial and not-for-profit activities in many sectors of American society – broadcasting, live entertainment, corporate communications, education, worship, government, and recreation. Shure noted that the comments filed in the above dockets, including filings made by the National Football League, The Walt Disney Companies (including ESPN, ABC Network and Walt Disney World), The Broadway League, The Boeing Corporation and many others, attest to the extensive reliance on professional wireless microphones across range of industries and applications.

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Shure expressed its strong view that continued access to clean, interference-free UHF spectrum must be preserved even as the Commission implements incentive auctions and repacking in an effort to expand spectrum available for wireless broadband services. Wireless microphone manufacturers and users have for decades developed and operated wireless microphones in the UHF band. That spectrum is uniquely suited to wireless microphone operations and today the UHF band is the global spectrum choice for wireless audio.

We discussed the importance of preserving wireless microphone protections that were recently developed in the White Spaces proceeding as the Commission seeks to implement incentive auctions and repacking to create spectrum for wireless broadband use. In particular, we outlined the need to retain the two reserve TV channels per market for wireless audio production and expand Part 74 license eligibility to reflect current widespread professional wireless microphone use in multiple diverse applications. We discussed the view expressed by several commenting parties that the current geolocation database rules 30-day advance request requirement is unworkable for many professional wireless microphone users, specifically those who routinely require spectrum that exceeds the amount available in the reserve channels and who require registration in the geolocation database in near real time.

We also expressed general support for the modified band plan proposed by the NAB and CTIA and discussed how wireless microphones could adapt to that plan. Reserve channels could be identified below channel 37 but should not be positioned in a guard band or “mid-band gap.”

Finally, Shure explained that market forces should determine the direction of future wireless microphone technology development. Shure cautioned that the Commission should not mandate digital transmission for wireless microphones or otherwise impose technology mandates. Growing customer demand has driven significant innovation and advances in wireless microphone spectrum efficiency and the Commission should be careful not to inhibit such market forces.

If you have any questions regarding this ex parte notice, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang
Timothy Bransford
Kimberly A. Lacey

cc: Stephen Buenzow
Paul D'Ari
Ira Keltz
Julius Knapp
Charles Mathias
Geraldine Matise
Erin McGrath

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