

Catherine Wang  
Direct Phone: 202.373.6037  
Direct Fax: 202.373.6001  
catherine.wang@bingham.com

April 24, 2014

**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 April 22, 2014, I and other parties representing wireless microphone interests identified on the attached list met with Chairman Tom Wheeler and other senior Commission staff also identified on the attached list. On behalf of wireless microphone manufacturers, content providers, broadcasters, professional users, and frequency coordinators, we discussed the essential role that wireless microphones play in today's modern productions in broadcasting (including breaking news), theater, music, sports, business, government, and education delivered live and via traditional broadcasting and broadband services. Productions using professional wireless microphones operating in UHF frequencies deliver enormous economic, cultural, commercial, and educational value to the American public and represent the "front end" of the content creation chain.

We briefly discussed the impact of multiple changes that have occurred in the Commission's rules starting with the DTV transition, the transition of wireless microphones out of 700 MHz frequencies, and the development of sharing rules in the Commission's White Spaces rules which together have drastically reduced the amount of spectrum available exclusively for wireless microphone operations at the same time that demand for wireless microphone operations has soared. We noted that wireless microphone users have extensive embedded equipment operating in the

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New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
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Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806

T 202.373.6000  
F 202.373.6001  
bingham.com

UHF bands, much of which was recently purchased as a result of the displacement from 700 MHz frequencies and changes following the White Spaces proceeding.

We gave examples of professional productions which routinely use hundreds of wireless microphone channels making extensive use of UHF spectrum. In response to rapidly increasing demand and reductions in available spectrum, wireless microphone technology continues to advance enabling more microphone use in available spectrum. However, those efficiency gains can only be realized with the use of “clean” spectrum free from interference from other operations in nearby channels.

With these considerations in mind, we discussed the need for FCC Rules that will enable wireless microphones to weather the change in UHF spectrum allocations as a result of incentive auctions and DTV broadcast rebanding. In particular, we urged the FCC staff to:

- identify some amount of 600 MHz spectrum that can be used exclusively by priority professional wireless microphone operations,
- enable wireless microphones to operate in the 600 MHz guardbands, including the mid-band gap, on a registered priority basis,
- expand and update FCC licensing rules to cover professional users who require interference protection through registration in the geolocation database,
- amend the White Spaces rules to improve speed of operations of the database,
- enable wireless microphones to continue operating in auctioned 600 MHz spectrum as long as possible until new services come online, and
- expedite efforts to identify additional sources of spectrum to be made available for additional wireless microphone use in the long term.

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

Very truly yours,

/s/

Catherine Wang

cc:

**Wireless Microphone Interests**

Mark Brunner	Shure Incorporated
Edgar Reihl	Shure Incorporated
Catherine Wang	Bingham McCutchen (for Shure)
Joe Ciaudelli	Sennheiser Corporation
Mitchell Lazarus	Fletcher Heald Hildreth (for Senneheiser)
Jackie Green	Audio-Technica
Jerry Waldron	Covington& Burling (for National Football League (NFL), National Hockey League (NHL),Major League Baseball (MLB), National Association of Stock Car Racing (NASCAR))
Anne Lucey	CBS Corporation
Susan Mort	Time Warner, Inc.
Susan Fox	The Walt Disney Companies
Tom Ferrugia	The Broadway League
Bruce Franca	National Association of Broadcasters
Rick Kaplan	National Association of Broadcasters
Jared Sher	21st Century Fox
Kathleen Kirby	Wiley Rein (for Radio and TV Digital News Associations (RTDNA))
Henry Cohen	CP Communications
Roger Charlesworth	DTV Audio Group

**FCC Attendees**

Chairman Tom Wheeler	
Ruth Milkman	Office of the Chairman
Diane Cornell	Office of the Chairman
Julius Knapp	Office of Engineering and Technology
Paul Murray	Office of Engineering and Technology
William Lake	Media Bureau
Edward Smith	Incentive Auction Task Force
Howard Symons	Incentive Auction Task Force
Gary Epstein	Incentive Auction Task Force
Roger Sherman	Wireless Telecommunications Bureau
Jessica Almond	Wireless Telecommunications Bureau