



July 24, 2009

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Protections for Wireless Microphone Audio Systems; ET Docket No 04-186 and WT
Docket Nos. 08-166, 08-167

Dear Chairman Genachowski:

The National Systems Contractors Association ("NSCA") is the leading not-for-profit association representing the commercial electronic systems industry. NSCA's more than 2,500 member companies work within the low-voltage industry, and include systems contractors/integrators, manufacturers of products such as wireless microphones, sales representatives, engineers and other allied professionals. NSCA helps its members strive for excellence in all aspects of their work, including the design, manufacture and installation of superior audio/visual systems wherever they are needed.

Our members are dedicated to providing the best experience possible for their customers, whether it be in manufacturing a high quality low-voltage electronics device, or designing and implementing a complex audio/video solution for a large conference or production. One way NSCA helps them accomplish this is by advocating on their behalf when possible changes to laws may prevent them from providing the superior services their customers have come to expect and demand. For example, when our members design and implement an audio/visual solution for a theatrical production, worship service, concert, boardroom, trade show, educational institution, or a myriad of other venues and productions, the one thing in common is their customers demand that they receive interference free audio services -- often involving wireless microphones. Therefore, we are greatly concerned with any proposed changes to the Federal Communications Commission's rules that may degrade the quality of audio services our members can provide. Some of the recent proposals before the Federal Communications Commission ("FCC") in the White Spaces docket fall into this category.

We have examined the various proposals before the FCC, and are troubled by those that want to remove many of the protections necessary to provide an interference-free environment for wireless microphones. In the White Spaces docket, the FCC has been confronted by a number of proposals by potential users and manufacturers of new devices that only nominally address the needs of wireless microphone users.

We believe it is essential that the FCC do whatever is necessary to prevent new electronic devices from interfering with wireless microphone systems operating in the VHF/UHF frequencies. This includes not limiting the types of wireless microphone users that can access and use the geolocation database. Our members need to have the flexibility to go into any type of situation and provide a high quality audio solution regardless of the nature of the intended use of the wireless microphones. Also critical is the need for new electronic devices to be able to sense the presence of microphone operations and avoid transmitting on frequencies in use.



Our members' real world experience is that in setting up a high quality wireless microphone environment, wireless microphone users need as much flexibility as possible in selecting frequencies that take into account the immediate demands of the frequency environment in which they are operating. A geolocation database system cannot account for these last minute changes.

In addition, NSCA is opposed to any proposal such as Verizon's that has the FCC treating wireless microphone transmissions the same as other "low power Part 15" equipment without specific protections. If Verizon's proposal is adopted, any of the new electronic devices being developed would be able to interfere with wireless microphone systems, which ruin the experience for anyone using the microphones.

If you have any questions regarding this letter, please do not hesitate to contact me.
Very truly yours,

Chuck Wilson

Chuck Wilson
Executive Director
National Systems Contractors Association

CC: Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Julius Knapp
James Schlicting