

Consultation: PMSE clearing the 700 MHz band - Support for PMSE equipment owners

Responses from Better Sound Ltd

Q1

In principal, we agree with the criteria.

However we must take issue with 3.2.4

We feel that the proposed continued use of the 694-703 MHz guard band re-aligns the arbitrary “50% tuning range” criteria to the detriment of the majority of equipment users/owners.

With the inclusion of the guard band, a significant proportion of equipment (e.g. Sennheiser range N-GB) will no longer be eligible for funding. The loss of just over 47% of the tuning range is very considerable. This is further exacerbated by geographical restrictions on the remaining spectrum and the uncertainty as to how usable the Guard Band spectrum will be.

Better Sound concurs with BEIRG “that in order to ensure that PMSE equipment owners are left no worse off by the clearance of the 700 MHz band, any equipment impacted, no matter how minimally, should be eligible for funding”.

We also propose that the 694-703 MHz guard band should be excluded from any measurement criteria.

Q2

No.

Consideration must be given to the impact of DTT realignment on spectrum availability for PMSE usage below 694 MHz.

Q3

No.

We support BEIRG’s belief “that any loss of functionality represents a loss attributable to Ofcom’s decision to clear the 700 MHz band. Therefore every user affected should be entitled to receive a commensurate amount of funding as any reduction of equipment utility leaves PMSE equipment owners demonstrably worse off than they were before the clearance. ... For those businesses which own the most equipment, all equipment should be eligible regardless of other considerations. These businesses will have to replace equipment below 694 MHz in order to achieve the necessary spectral efficiency to continue serving the most spectrum intensive events”.

Q4

We do not have any evidence.

However, as per our answer to Q1, we propose that the 694-703 MHz guard band should be excluded from any measurement criteria.

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Q5

No.

The residual value funding approach cannot recognise the full extent of costs that PMSE equipment owners will be faced with. The formula solely relates to the equipment and excludes ancillary costs such as administration, set up and training.

Q6

Yes, we broadly accept this approach.

Q7

No.

Q8

Yes.

Q9

We are surprised that a large proportion of PMSE equipment owners will not have evidence of when they purchased their equipment. However, we have no further comment.

Q10

We concur with BEIRG's response.

The reality is that equipment will have to be replaced prior to mid-2020. This is to allow time for replacement equipment planning, ordering, manufacture and implementation. Where equipment is replaced in advance, the average age of equipment should be adjusted to reflect this.

Q11

No comment.