

Steve Jones
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

5 August 2009

Dear Steve

London 2012 Olympic Games and Paralympic Games: draft spectrum plan

I am writing to you on behalf of RadioCentre, the industry body for Commercial Radio, in response to the above consultation. Formed in July 2006 from the merger of the Radio Advertising Bureau (RAB) and the Commercial Radio Companies Association (CRCA), RadioCentre's membership comprises the overwhelming majority of UK Commercial Radio stations, who fund the organisation. RadioCentre is governed by a board of eight directors, representing a cross section of the industry and including all the major Commercial Radio groups.

The role of RadioCentre is to maintain and build a strong and successful Commercial Radio industry - in terms of both listening hours and revenues. RadioCentre operates in a number of areas including working with advertisers and their agencies, representing Commercial Radio companies to Government, Ofcom, copyright societies and other organisations concerned with radio. RadioCentre also provides a forum for industry discussion, is a source of advice to members on all aspects of radio, jointly owns Radio Joint Audience Research Ltd (RAJAR) with the BBC, and includes copy clearance services for the industry through the Radio Advertising Clearance Centre (RACC).

This letter constitutes the RadioCentre response to the Ofcom consultation document 'London 2012 Olympic Games and Paralympic Games: draft spectrum plan'.

- Commercial Radio's spectrum use

Commercial Radio stations are regular and extensive users of spectrum for Programme Making and Special Events (PMSE). Radio stations currently obtain this spectrum in order to operate Wireless Microphones, In-Ear Monitors (IEMs), Talkback Links and Programme Links.

This enables stations to produce wide variety of different programming depending on the type of station and its activities. These range from the outside broadcasts (OBs) of major sporting or cultural events, to efficient internal communications and coverage of live music sessions.

For stations which use PMSE spectrum regularly licences are generally secured on an annual basis from the Joint Frequency Management Group (JFMG). However, they are also obtained on an ad-hoc basis where necessary. On the whole the industry reports that it is satisfied with this arrangement, which provides an efficient and effective system for the management of spectrum in most circumstances.

During the period of the 2012 Olympics the priority for Commercial Radio industry will be to ensure that stations continue to be able to access PMSE spectrum, efficiently and at an affordable price, in and around key locations where the Games are taking place.

- Draft spectrum plan

The Ofcom consultation document is understandably focused on delivering the guarantees concerning spectrum, which the UK Government provided to the International Olympic Committee. These involve the allocation of frequencies, waiving of fees and ensuring availability of spectrum to the "Olympic Family", including rights-holding broadcasters (RHBs). The draft spectrum plan appears to provide a sensible basis for a framework that will be capable of delivering these commitments.

However, this plan is only considering the PMSE spectrum demands in order to ensure that these commitments are met, which means that (by definition) it is neglecting users of spectrum that are not clearly defined within the scope of these commitments.

Therefore, while it is clearly important for Ofcom to discuss spectrum demand for broadcasting with the Olympic authorities and RHBs, these considerations should also be extended to include the activities of other broadcasters who may not have access to the coverage of the Games from within the venues.

While the precise nature of Olympic coverage by Commercial Radio stations is difficult to predict at this time, a number of stations that do not have the status of an RHB will still require access to the PMSE spectrum, so that they are able to broadcast as effectively as possible from the areas in and around the Olympic venues. The likelihood is that such demand will be particularly intensive in London at the Olympic Park and in the Lower Lea Valley.

At present the draft spectrum plan does not address the need for Commercial Radio and other broadcasters. Such organisations simply face the uncertainty reflected in para 4.47 that "we do anticipate having to impose some restrictions on business-as-usual spectrum use for PMSE at times and in locations of peak Games demand. We will, of course, endeavour to keep these restrictions to the minimum necessary".

That said we are encouraged by the proposals in Section 6 of the document, which indicate that there is ample spectrum capacity available for the sort of audio links used by radio broadcasters, including wireless microphones and IEMs. Although in or view, it is important for any comprehensive spectrum plan to also consider whether this capacity will be available to broadcasters in the vicinity of the Olympic venues.

- Recommendation

This is only an initial response on behalf of the Commercial Radio industry and is simply intended to highlight some of the issues that are not covered satisfactorily in the consultation document.

While we would urge Ofcom to note the points raised in this response, the most important recommendation that we would make would be for Ofcom to work more closely with the full range of stakeholders and likely users of PMSE spectrum, in order to conduct a thorough analysis of the issues.

The understandable priority that Ofcom has given in the current plan to the delivery of Government's commitments to the IOC is an important element of the draft spectrum plan, but a comprehensive plan must also involve the many commercial broadcasters

who may not hold the rights to broadcast from with the Olympic venues, but will still require access to spectrum.

Representatives from Commercial Radio would be happy to advise on the detailed requirements and technical specifications of the equipment, which they use for such activity in order to help address detailed questions and ensure fair and efficient access for all broadcasters.

RadioCentre would be happy to assist in co-ordinate this important input from Commercial Radio and we would urge Ofcom to consider these requirements in the context of its overall spectrum plan.

I hope that you find these comments helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Harrison". The signature is written in a cursive, slightly slanted style.

Andrew Harrison,
Chief Executive, RadioCentre