



Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

New Spectrum for Audio PMSE – Response

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Executive Summary

- Ofcom is to be applauded for recognising that, during and post the re-purposing of the 700 MHz band, the audio PMSE Sector will face serious challenges
- Ofcom is to be congratulated on spending significant time and resources looking at possible alternative future supplemental bands for audio PMSE operation
- Further work needs to be undertaken by the audio PMSE community, in conjunction with Ofcom and other interested parties to fully determine the usability of both bands
- In order to assess the usability of the proposed bands, BEIRG will require detailed white space maps of the 600MHz band post 700MHz clearance
- Should further studies conclude that the bands are truly usable, Ofcom will then need to engage with other administrations and regulators in order to harmonise both bands for audio PMSE use as widely as possible in order to realise economies of scale to both audio PMSE manufacturers and users

Introduction

BEIRG has long contended that any reduction in the spectrum available to PMSE users in the UHF would have significant negative repercussions for the quantity and quality of large scale event production by this sector. It is therefore hugely welcome that Ofcom has recognised the veracity of this assertion and is taking steps to address the shortfall.

BEIRG wants to place on record our thanks for the work already undertaken by Ofcom in this regard and we look forward to working closely with Ofcom to identify solutions for audio PMSE that will allow the sector to continue to make its enormous economic, cultural and social contribution to the UK.

Throughout these deliberations, it is vital to note and remember the conclusion reached by the Lamy Report: that “Member States should ensure that broadcasters and PMSE users are left no worse or no better off than they would have been without any clearance of the 700 MHz band.”¹ BEIRG believes that the only scenario in which UK PMSE users would not be left ‘worse off’ is if PMSE users were granted access to both the CAA and MSS band, subject to a further program of measurements and tests to ascertain the true usability of the bands.

It is also important to note that the PMSE sector views new spectrum allocations as supplemental to access to 470-694MHz (post 700MHz repurposing) and we ask that Ofcom remain committed to their recent WRC-15 statement. The new bands should be a replacement for the loss of 800MHz and 700MHz bands, rather than the future loss of the entire UHF band. In the event that, post 2030, the remaining UHF band is repurposed, the PMSE sector would require access to additional spectrum beyond any which is currently under consideration.

It is important to acknowledge that the viability of both bands depends on information that is not yet available. Firstly, the future usage of the proposed additional spectrum will be determined by the white space landscape of 470-694MHz following the clearance of the 700MHz band. For this reason, it will be necessary to see white space maps of the repackaged DTT transmissions. Secondly, the level of compensation made available by Government will affect the appetite of PMSE users to migrate to the new spectrum and of manufacturers to design equipment for use in that band, therefore affecting the business case for the new bands. Finally, and while we recognise that this information will not become available for some time, the prevalence of WSDs in the 470-694 MHz spectrum will affect the quality of the spectrum available for PMSE use and, hence, what additional spectrum may be needed elsewhere. All of this information is inextricably linked, and it is critical that this feeds into Ofcom’s own understanding of the viability of the alternative spectrum, and that Ofcom recognises that there are reasons why

¹ *Report To The European Commission Results Of The Work Of The High Level Group On The Future Use Of The Uhf Band (470-790 Mhz)*, Pascal Lamy, page 12, Sept 2014, http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=6721, accessed on 3 December 2015

BEIRG does not believe that it is currently in a position to determine conclusively the viability of either band as a solution.

MSS Band – 1525 to 1559 MHz

On the evidence that has been presented, BEIRG believes that that the MSS Band (plus the existing 1518-1525 already allocated) should be made available as soon as practically possible. This band would represent the fastest solution to the issue of PMSE not having access to enough spectrum to maintain current production values and capacity. BEIRG believes that the spectrum in the MSS band is cleaner than that in the CAA band and would be easier for PMSE manufacturers and users to operate within.

Manufacturers face additional challenges to design equipment for use in both proposed bands. Given Ofcom's aim to clear the 700 MHz by 2020 (or earlier if the clearance is undertaken in stages), we urge Ofcom to immediately undertake further investigation along with key stakeholders, users and manufacturers to ascertain the viability of these bands.

It is also important to note that there is significantly more likelihood that CEPT/ITU could be persuaded to allocate this band for PMSE use than other suggested bands.

Given that the MSS band has been identified as suitable for use by PMSE services, and in the absence of any compelling reasons not to make it available, why is Ofcom solely proposing access to the CAA band?

What 'new services' does Ofcom envisage might be introduced into this band, if any, in the short, medium and long term?

CAA Band – 960 to 1164 MHz

On current evidence, BEIRG suspects that the CAA band will, initially, present far more challenges for equipment design and spectrum management than the MSS Band. In contrast to sharing with DTT transmissions, which provides a stable and predictable operating environment, usage of the CAA band is far more volatile and unpredictable, which represents a potential barrier to successful coexistence with PMSE. More studies and measurements will need to be conducted by the PMSE community, alongside Ofcom, to establish if the band is truly usable in the major hotspots around the UK. However, it is important to stress that PMSE manufacturers are open to working with Ofcom to further explore the viability of the band.

Clearly the likelihood of Ofcom persuading other administrations and regulators that the CAA band is a viable option for future PMSE use is a crucial aspect to this process. What resources are Ofcom committing to attempting to persuade other administrations (and especially the International Civil Aviation Organisation) that the CAA band is a viable solution for PMSE? As explained previously, a UK only solution is a major concern for PMSE manufacturers. However, access to the CAA band along with the MSS band would mitigate this concern considerably.

The amount of funding available to compensate PMSE users and manufacturers for the 700 MHz clearance is another important factor in this process. International harmonisation is crucial to the success of the PMSE sector and all efforts must be made to achieve this. However, the fact remains that the more money that is made available to the PMSE sector, for research and development into new equipment, the more favourably manufacturers would view a solution that may not involve international harmonisation.

The clearance of the 700MHz band and subsequent repackaging of DTT services will result in less available white space in the remaining UHF. In order to further judge the viability of the CAA band, BEIRG needs to know what the white space landscape will look like after the 700MHz clearance.

As with the MSS band, what 'new services' does Ofcom envisage might be introduced into this band, if any, in the short, medium and longer term?

Finally, what consideration has Ofcom given to supporting the new bands suggested, by involvement in RES 59 at the ITU?

Conclusion

BEIRG welcomes the work already undertaken by Ofcom to identify new spectrum for use by the PMSE community. We are keen to work with Ofcom to further develop these proposals, explore their viability and find a suitable solution before PMSE users are cleared from the 700 MHz band.

Throughout these deliberations, the conclusion of the Lamy Report, that PMSE users should be "left no worse or no better off" following the 700 MHz clearance, should be the overriding concern of Ofcom. Currently BEIRG believes that being granted access to only the CAA band would leave the UK PMSE sector "worse off". Therefore, it is our contention that both bands, subject to positive outcomes to further testing and measurements in the bands, should be made available to PMSE users.

British Entertainment Industry Radio Group

The British Entertainment Industry Radio Group (BEIRG) is an independent, not-for-profit organisation that works for the benefit of all those who produce, distribute and ultimately consume content made using radio spectrum in the UK. Venues and productions that depend on radio spectrum include TV, film, sport, theatre, churches, schools, live music, newsgathering, political and corporate events, and many others. BEIRG campaigns for the maintenance of 'Programme Making and Special Events' (PMSE) access to sufficient quantity of interference-free spectrum for use by wireless production tools such as wireless microphones and wireless in-ear monitor (IEM) systems.

As well as being vital in producing live content, wireless PMSE technologies play a key role in helping to improve security and safety levels within the entertainment industry and other sectors. Their benefits include improving the management of electrical safety, the reduction of noise levels, the development of safety in communications and reducing trip hazards as well as providing an essential tool for the security orientated services. Wireless equipment and the spectrum it operates in are now crucial to the British entertainment industry.

BEIRG is a member of the Association of Professional Wireless Production Technologies (APWPT)², which promotes on an international level the efficient and demand-driven provision and use of production frequencies for professional event productions, as well as safeguarding such production frequencies for the users on the long run.

² <http://www.apwpt.org/>