

Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

Ofcom's Call for Inputs "Strategic Review of UHF Spectrum at 420-470 MHz"

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BEIRG Response

BEIRG has repeatedly responded to consultations and otherwise engaged with Ofcom to express our concern at the erosion of the quantity and quality of spectrum to which the Programme Making and Special Events (PMSE) sector have access. Ofcom have consistently assured BEIRG that protection of incumbent users, including the PMSE sector, is a priority.

Yet, despite these assurances, it seems that Ofcom is pursuing a series of policies, some already realised and others, such as the review of the 420-470 MHz band, under consideration, which will result in PMSE users being made to operate in an ever decreasing quantity and quality of spectrum. The results of this reduction for the sector, without significant mitigating steps being taken, would likely be incredibly serious.

PMSE's eviction from the 800 MHz band meant that an ever increasing number of licensed spectrum allocations (over 90,000 per annum) had to be satisfied using just the spectrum between 470 MHz and 790MHz. The proposed reallocation of the 700 MHz band of spectrum would result in PMSE users losing access to a third of the spectrum which they currently use. Ofcom's intention to introduced unlicensed White Space Devices into UHF spectrum will create an even more crowded and difficult RF environment.

As part of its decision to pursue the reallocation of the 700 MHz band, Ofcom acknowledged that because of heavy PMSE use in this band, there would be a need to allocate audio PMSE users alternative spectrum to satisfy future demand. BEIRG acknowledges the work that Ofcom is currently undertaking to identify suitable alternative spectrum.

Whilst the PMSE users represented by BEIRG do not use the 420-470 MHz band, clearly any decision to move talkback radios out of this spectrum into the 470-694 MHz band is likely to result in an even more crowded, unreliable and difficult environment for PMSE users. It seems strange that Ofcom would consider this approach when it has already acknowledged the fact that PMSE use of this band currently outstrips capacity.

For this reason we oppose any reallocation of the 420-470 MHz band which would result in even more PMSE users being required to license spectrum in the 470-694 MHz band, until such time that the PMSE sector has been granted a sufficient quantity and quality of alternative spectrum in which to operate.

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. Entities 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. 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)¹, 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.

¹ <http://www.apwpt.org/>