Question 1: Do you agree with our identification and analysis of the options for how the PMSE sector could make use of the digital interleaved spectrum? Which options, if any, do you favour?:

Audio Ltd does not feel that any of the options addresses the requirements of the PMSE community fully.

Question 2: Do you agree that we should offer one package of digital interleaved spectrum?:

Audio Ltd believes that Ofcom should gift one package of ‘digital’ interleaved spectrum to a single commercial band manager and that band manager should be JFMG Ltd - being the most competent manager for the spectrum which is currently utilised by the PMSE sector.

Question 3: Do you believe that greater licence-exempt use could be made of Channel 70 by PMSE? Are there any obstacles that would need to be overcome first?:

Audio Ltd’s understanding of Channel 70 is that it constitutes just 2 MHz of spectrum. It is not a full 8 MHz band and spectrum above the 863 MHz band has already been allocated for other uses. Audio Ltd views licence except use of this 2 MHz of spectrum as inappropriate for professional purposes.

Question 4: Do you have any comments on the scope for applying the options discussed above to bands other than the digital interleaved spectrum?:

It is not possible for the disparate PMSE community to bid for any spectrum. We are concerned with Ofcom’s proposals to deregulate the CH69 band. At this moment in time this channel is utilised by the majority of freelance sound mixers working across the U.K. in the production of content for broadcasting. The continued access to channel 69 along with a great degree of protection for the professional user must be a priority for Ofcom and therefore we feel the access to channel 69 should remain on a licensed basis.

We also feel that channels 67 and 68 should be allocated to the professional use of radio microphone systems on a primary basis. We feel that there is a possibility for sharing this spectrum with other low power licensed users and this option has not been fully explored.

Comments:

Audio Ltd does not feel that Ofcom has taken the time to consult with the manufacturers of professional radio microphone systems, of which we are the only UK manufacturer wholly manufacturing radio microphone systems in the U.K. The timescales referred to in the document are unrealistic and as has been mention to Ofcom in the past, we are small manufacturers and have limited resources to apply and therefore we cannot be expected to instantly produce equipment to fulfill future
needs without adequate notice. It is also extremely unhelpful when Ofcom put out a joint statement (Spectrum information sheet March 2006), which effectively severely restricts our trade in UK: 'JFMG customers who hold licences for this spectrum have already been informed of the potential changes to spectrum availability in this band, and once more information is available they will be provided with an update. Until then we would urge users of the band to avoid investing in new equipment, given that certainty regarding spectrum access cannot be provided.'