

## **Ofcom Consultation**

### **British Entertainment Industry Radio Group (BEIRG)**

#### ***Glasgow 2014 Commonwealth Games Radio Spectrum Planning Consultation Response***

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## BEIRG Glasgow 2014 Commonwealth Games Radio Spectrum Planning Consultation Response

The British Entertainment Industry Radio Group (BEIRG) is a not-for-profit organisation representing professional users of spectrum in the Programme Making and Special Events sector.

In relation to the Commonwealth Games in Glasgow in 2014, BEIRG's key concerns are:

- That there is sufficient quantity of spectrum for those producing content for the Games
- That there is sufficient spectrum for other users (theatre, TV, live music) operating in the local area
- That spectrum for both these groups is interference free

In 2.42 Ofcom outlines its initial conclusions that demand for spectrum is likely to be 'significantly less' for most services than for the London 2012 games. Whilst BEIRG agrees that demand is likely to be reduced, increasing production values (requiring greater use of PMSE equipment) and a reduction in the spectrum available to PMSE is likely to lead to significant demand for a limited amount of spectrum.

### Estimating demand for spectrum

In 3.1 the document states that "technological choices and developments cannot reliably be foreseen or have not been made yet". Whilst this may be true for some services involved in the Commonwealth Games, it is not the case for PMSE. Whilst there will be developments in PMSE equipment between now and 2014, the nature of the industry, and the nature of these types of developments, mean that this will not have any significant impact on the quantity of spectrum needed by PMSE in the Games.

There have been year on year increases in spectrum use for PMSE at large events. For example, at the Eurovision Song Contest wireless microphone use has increased from 54 ch wireless mics and 16 ch IEM in 2004, to 104 ch wireless mics in 2012.

The document states that "wireless equipment will be retuneable to some extent". Whilst this is true, it must be noted that PMSE equipment has a limited tuning range and, where possible, retuning a piece of equipment to work in a very different part of the spectrum is an expensive process.

The document states an expected demand from wireless microphones and IEM of around half of that at London 2012. Whilst we agree that there is likely to be reduced demand, we are concerned that there will be a serious squeeze on the spectrum available to those producing content, both for the Games and for business as usual applications. Unlike at the London 2012 games, the 800MHz band will not be available to PMSE by the time the Commonwealth Games take place. There will be very little spectrum available for PMSE above CH38 (only 2 channels). This will be reduced even further should ch51 be allocated to a local TV service. The loss of this spectrum, which was available for London 2012, will represent real operational difficulties for PMSE. We welcome the acknowledgement in 5.11 in this document that "it will be essential to properly coordinate these day to day demands for PMSE with those of Glasgow 2014".

The document also correctly states that Glasgow already has a congested spectrum environment. BEIRG is concerned that Ofcom views "relying more heavily on wired communications" as the solution to this situation. Modern production techniques rely heavily on wireless equipment, they give performers greater freedom of movement and allow producers the opportunity to develop more elaborate performances. As

with London 2012, Glasgow 2014 provides the UK with an opportunity to showcase the world-leading work of its creative industries. We trust that this is not restricted by a lack of available spectrum.

Ofcom has stated that spectrum could be borrowed from civilian spectrum, public-sector spectrum and licence exempt spectrum. Whilst this may be suitable for one-off events, BEIRG remains concerned about the gradual erosion of PMSE allocated spectrum, and the ability of business as usual PMSE users to produce productions which require large numbers of wireless microphones in the longer term.

The document also states that PMSE will be operating in 470-862 MHz; yet the vast majority of PMSE equipment operates only in 470-790 MHz. As yet, there is still no firm announcement from Ofcom on the future of the 600MHz band. As BEIRG has previously stated, we have serious concerns about the future of PMSE operations should the 600MHz band not be available for PMSE use.

### Wireless microphones

In 7.19 the document states that whilst 470-862 MHz remained critical, higher range frequencies could start to be used by PMSE. Whilst it is true that there are some wireless microphones which can use higher bands, practically all equipment in the UK currently operates in UHF bands, and then only in the 470-790 MHz range as mentioned above.

The document also states that “there are opportunities for improvements in wireless-microphone technology (notably digital transmission systems) to improve spectrum efficiency”. Whilst it is true that there are digital microphones available, these represent a tiny fraction of wireless microphones in operation in the field. Given that the average lifespan of a piece of professional PMSE equipment is around 15 years, it will not be the case that there will be a majority of digital wireless microphones by the time the Games take place. There is significant uncertainty within the industry on the future of PMSE access to UHF bands. As a result, many PMSE users are delaying replacing equipment until there is more certainty for the industry.

As the document states, there are also many other operating concerns with digital systems, such as the impact of latency. BEIRG believes that it would be unwise to develop a spectrum plan which relied on a large take up of digital PMSE equipment over the next 18 months.

### Operating requirements

With regard to the Queen’s Baton Relay, there should be a consideration of the number of wireless microphones required for the coverage of this. The London 2012 Torch Relay saw a high level of wireless microphone use, and this must be considered at the earliest planning stages.

With regard to Ofcom assumptions E and I, it is important to note that not all equipment will automatically be ETSI compliant if it is imported. Ofcom should take this into account in its planning.