

# Consultation response form

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Consultation title	Ofcom's proposed Plan of Work
Full name	[X]
Contact phone number	[X]
Representing (delete as appropriate)	Organisation
Organisation name	British Entertainment Industry Radio Group (BEIRG)
Email address	[X]

## Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?	Confidential? – N

The British Entertainment Industry Radio Group (BEIRG) strives to maintain access to sufficient quantity and quality of interference-free spectrum required by the 'Programme Making and Special Events' (PMSE) sector. PMSE uses essential wireless production tools such as wireless microphones and wireless in-ear monitor (IEM) systems across a diverse range of applications in everyday life.

PMSE is often regarded as a small niche sector that just involves microphone manufacturers, rental companies, venues, production companies and engineers. The reality is vastly different and in fact PMSE access to clean spectrum is instrumental in delivering a wide array of events that support a huge proportion of businesses, services and consumers on a daily basis. Indeed, the DCMS Create Growth Programme states *The creative industries are one of the major UK economic success stories in recent years. They have grown at twice the rate of the wider economy since 2010 - generating approximately £115.9 billion for the economy and providing more than two million jobs<sup>1</sup>.* Across Europe, the cultural and creative industries are worth 4.4% of EU GDP and provide more than 8 times as many jobs as the telecommunications sector. Without PMSE, this economic input and output simply could not happen.

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<sup>1</sup> [Create Growth Grant Programme: application guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The ongoing squeeze on PMSE spectrum allocations, and absence of spectrum policy to deliver security for PMSE applications impacts a far wider ecosystem than those listed above. As an example, the inability to produce a TV production such as “Strictly Come Dancing” would not only impact millions of TV viewers, jeopardising one of the BBC’s programming jewels, but it would also undermine the business of the costume & make up teams, sound, lighting & video companies, staging companies, musicians & performers, and the many technical engineers required across all of these disciplines.

Consumer demand for content has driven huge growth in TV production, film production, theatre, sporting events, political conferences, business events, news gathering and interviews, live music concerts and festivals, state events, education, safety of life communications systems, etc. With a shift from linear viewing or consumption to interactive on-demand services that satisfy the consumer appetite for better quality data and coverage, the reach of every single PMSE supported event has become global.

PMSE equipment is critical to content creation, because without clean audio at the point of capture, the delivery to audiences is compromised. Historically the audience may have been constrained to live theatre or music events, but today every part of daily life relies on technology to deliver high-production values to global audiences across an endless list of applications. In every single instance, the content created in each application will be performed, recorded, streamed and beamed to live audiences, remote locations or online audiences globally, reaching millions, if not billions daily.

This growth in turn also feeds the explosion in digital content being delivered via the mobile platforms, and productions like the one outlined above generate significant export revenue too, increasing both the hard and soft power of the UK.

### **Comments on the Annual Plan**

BEIRG has developed a strong and productive working relationship with Ofcom, in recent years working together on the 700 MHz Funding Scheme and preparing for WRC-23. We have been encouraged that Ofcom have listened to the concerns of the PMSE community and acted upon them, and hope that this will continue as our industry faces challenges in the future.

BEIRG would encourage Ofcom to consider our sector as a key stakeholder – not only in areas that directly impact our operation, but to avoid unintended consequences of other actions that could have a catastrophic impact on our industry. Both manufacturers and stakeholders will continue to work as hard as we can to ensure that we operate in as efficient a fashion as the technology permits us to, but it is only with Ofcom’s full co-operation that we will be able to continue to support the UK’s world-leading creative industries.

We are however, grateful for Ofcom’s support for “No Change” in the 470 MHz to 694MHz UHF band at WRC-23. We also hope that Ofcom recognises that BEIRG represents the needs and concerns of a huge industry, which supports planned programming as well as unplanned events such as the exceptional coverage of the death of Her Majesty the Queen.

We are aware of future challenges, which whilst not impacting our sector now, must be addressed in plenty of time in order to allow the PMSE community to continue to provide for our fantastic creative industries and to support programming as well as events such as the King’s Coronation. We urge Ofcom to continue regular dialogue with the industry and to understand that having already faced two significant moves resulting in a reduction of nearly 50% of the spectrum available to us, we have no security of tenure and thus need to be at the front and centre of decision-making so that we are not adversely impacted.

## **Conclusion**

The PMSE sector faced a damaging loss of spectrum access as a result of the 700 MHz spectrum clearance and previous 800MHz clearance but has responded to the challenge to use the remaining and the new allocation of spectrum as efficiently as possible and has worked with Ofcom at all stages of the clearance programme.

We urge Ofcom to look at all possibilities for PMSE only spectrum allocations to allow the sector to plan and invest accordingly.