

## **OFCOM Consultation Response 12.13**

### **Executive Summary**

- The British Entertainment Industry Radio Group (BEIRG) has grave reservations regarding the possibility of allowing mobile telecoms or wireless data services to share the same spectrum bands as Programme Making and Special Events (PMSE), if there is any threat of interference to existing users.
- Were interference to be encountered as a consequence of shared use, PMSE equipment could be prevented from operating, leading to unavoidable damage to performances, the potential cancellation of live shows, and an associated socio-economic loss.
- PMSE has long been a very efficient user of spectrum. Users operate within TV interleaved spectrum (white space) alongside Digital Terrestrial Television (DTT) broadcasters, primarily in 470 to 790 MHz (TV Channels 21 to 60), utilising these gaps to make as effective and efficient a use of this interleaved spectrum as possible.
- In doing so, interference is minimised and the maximum possible benefit to users and consumers is obtained. BEIRG does understand that sharing is one potential method by which increasing demand for spectrum can be met, but it must not impinge on incumbent users.
- BEIRG strongly recommends that additional, licence exempt access to spectrum for wireless broadband communications and/or access to previously assigned spectrum facilitated through licensed usage should not be undertaken in bands where PMSE is operational, such as 500, 600 and 700 MHz, if there is a threat of interference or disruption to licensed PMSE users.
- It is therefore very likely that there will be little opportunity or available spectrum for additional services to have shared access in these specific bands, as the risk and consequences of interference to incumbent PMSE and DTT users are too great.
- Instead, Ofcom must ensure it first obtains a better understanding of what spectrum is currently utilised by mobile network operators, and determine how it could be used more efficiently to meet demand through refarming.
- BEIRG believes that this would prove to be a far more constructive and sustainable solution for long-term spectrum management, and prevent a reduced quality of service amongst both new and existing users, which may develop were they to share spectrum used by PMSE.
- The vast majority of UHF spectrum held at present by mobile operators could be eligible to undergo some degree of refarming to increase the efficiency of their service, as current usage levels are far from optimal. The overall quality of service, and hence benefits to users and consumers, would be far greater for all parties under this scenario.
- Our industry is already threatened by the proposed introduction of unlicensed White Space Devices into spectrum used by PMSE and DTT. As with mobile services, interference from WSDs may have a negative effect on PMSE operations in any spectrum that they are allowed to share in the future.
- BEIRG cannot see how unlicensed devices such as these could be entered into shared access agreements with PMSE as, by their very nature, they could not formally determine their geographic areas of operation, intended time usage or the levels of demand. This could present an unacceptably high risk of interference.
- While we accept that the principle of spectrum sharing could help to meet increasing spectrum demands, BEIRG calls on Ofcom to ensure that spectrum used by PMSE and DTT is protected from having to share with mobile broadband services, WSDs, M2M applications, Wi-Fi or any other potential users making use of shared access, which will subject existing PMSE users to interference and disruption.

The Executive Committee of the Institute of Professional Sound fully endorses the BEIRG executive summary above.

As an additional point we would ask Ofcom that should their proposal as contained in this consultation go ahead how would they respond to the likely possibility of a major live broadcast not being able to proceed because the licensed PMSE devices have been made unusable by the interference from unlicensed white space devices?

Simon Bishop: Chairman IPS Executive Committee