

Spectrum Roadmap Delivering Ofcom's Spectrum Management Strategy May 2022

Introduction

BEIRG has worked successfully with Ofcom in recent years finalising the details of the 700 MHz Funding Scheme and helping to ensure its smooth operation. We have been encouraged by the development of a strong working relationship in which Ofcom have previously listened to the concerns of the PMSE community and in many cases acted upon them. As a key stakeholder and contributor to the thriving Creative Industries sector, BEIRG believes it is essential that Ofcom demonstrates a firm commitment to continue working with the PMSE community

BEIRG had hoped that the Spectrum Roadmap would provide a clear plan of Ofcom's (spectrum) priorities over the next five years and how it would look to address these. However, to our reading the Roadmap sets out some speculative thinking, underpinned by broad generalities that do not provide the certainty that the PMSE sector (and other sectors) need in order to have the confidence to invest and innovate for the future. On this basis it is unclear what role the discussion document has in addition to the Spectrum Strategy and Plan of Work.

Against the backdrop of uncertainty around changes in DTT allocation, combined with the potential consequences of Agenda Item 1.5 for WRC-23, it is imperative that Ofcom devises specific PMSE policy that ensures that our sector has access to sufficient dedicated sub 1 GHz spectrum, with appropriate security of tenure, to allow it to continue to create and deliver world-class content with a global reach.

PMSE and Spectrum Sharing

The Roadmap highlights the need for greater spectrum sharing in order to meet increasing demand. Discussions in the document outline the methods of spectrum sharing between users (frequency, geography and time) to provide sustained improvements in spectrum use. As noted in the document, while PMSE is a significant user of spectrum most of this spectrum is already shared with at least one other incumbent and is therefore recognisably a very efficient user of spectrum.

However, as plans for spectrum sharing are progressed, BEIRG has some significant concerns – not all spectrum sharing scenarios effectively meet the needs of the sharers. It is essential that Ofcom understands that PMSE cannot share spectrum with everyone and anyone. The quality of service needed for the broad range of applications, technologies and activities that PMSE supports, from large scale sporting, cultural and State events to services of worship and events at schools and village halls need to be maintained as Ofcom devises a way to meet the increasing demand for greater spectrum access for the mobile sector this must always be a factor in the policy and decision-making processes.

When it comes to spectrum sharing, we continue to urge Ofcom to adopt an approach that considers the needs of the PMSE community. We have demonstrated that we are good sharers of spectrum in the past, and hope Ofcom will continue to show the same level of cooperation with the community in future, although clearly there are a number of criteria that influence the scope for sharing, that must be borne in mind. In addition, PMSE has

adapted to become increasingly spectrally efficient, with manufacturers making significant steps in this area. However, BEIRG would like to stress this level of technological advance should not always be relied on: squeezing the sector any more could seriously damage its ability to provide high quality content. PMSE has access to nearly 50% less spectrum than it did 10 years ago, and has had to adapt to continue to provide a high level of service to the ever-growing creative industries sector.

PMSE and increasing demand

In the discussion on increasing demand for spectrum, the Roadmap focusses on the growth in mobile broadband, the growing role in wireless connectivity in the digital transformation of industry and new and innovative applications, but does not pick up the growing requirements of existing services like PMSE. Also, the Roadmap doesn't recognise the link between the needs of future data services and how that will affect current users. For example, the paper notes the need for higher quality video, but this needs to be supported by higher quality content capture which increases the bandwidth requirements. The same is true of audio as consumers demand better sound quality and total 3D immersive audio experiences. In addition, the digital revolution driven by technology, new delivery platforms such as Netflix, Disney+, Amazon etc and growing consumer demand for data through live screening, streaming and IPTV, is clearly a significant force and which further drives up demand for spectrum for content capture.

WRC.23

BEIRG notes that the Roadmap highlights the WRC.23 and plans to consult on this in the near future. For both PMSE and Broadcasting, the key WRC.23 issue is Agenda Item 1.5, the review of the use of the frequency band 470-960 MHz in (ITU) Region 1. Given the importance of the 470 to 694 MHz band for both PMSE and Broadcasting, BEIRG is of the view that this should be highlighted in the Roadmap, and for Ofcom to take a clear position of 'no change' to the allocation of the band.

We will, of course, be respond to the WRC.23 consultation in more detail and very much hope that Ofcom will engage openly, listen to our concerns, and that these will be reflected in Ofcom's position ahead of the Conference. We also hope that all regulators will realise the need for global harmonisation to encourage the development of suitable technologies and aid our industry and encourage Ofcom to take the lead and pledge support for PMSE in terms of protecting our spectrum.

Conclusion

BEIRG urges Ofcom to look holistically at all spectrum usage. PMSE is an essential tool in all live events as well as TV, film, sport and corporate events. Without support from Ofcom, PMSE will be further challenged to provide high quality content in ever-decreasing spectrum and there will come a time when this is simply impossible to accomplish. The output enabled by PMSE runs far beyond the manufacturers, rental companies and supply chain businesses – and the consequences of ignoring this sector damages the whole creative industries, affects the daily lives of millions and in turn significantly impacts the UK economy.

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. Venues and productions that depend on radio spectrum include TV, film, sport, theatre, churches, schools, live music (including music festivals), 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 audio 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 as well as providing an essential tool for the security orientated services. 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/>