



Hand Held Audio Ltd



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PMSE clearing the 700 MHz band: Support for PMSE equipment owners

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Contact Details:

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Who we are

- **We have been trading for almost 30 Years in the PMSE sector**
- **We specialise in Radio Microphones, In ear monitors and Audio link systems ONLY**
- **We supply to Outside Broadcast, Live Music and Corporate Events**
- **We employ 6 people**

We are an SME company with all our business based around the PMSE sector,

In the last 10-15 years there has been an increasing demand for radio microphones and In Ear monitors (IEM) across all the sectors we work in.

Apart from the outside broadcast work we do, the bulk of our work is supplementing and planning larger events for other AV, Sound Company suppliers, this has had the effect of us investing heavily in spectrum ranges that are what would be considered non-standard in the UK, i.e. 700Mhz range.

Without this range we could have never fulfilled our customer's requirements on a large number of events, Shows, and broadcasts over the years.

It had already become more challenging after the 800 MHz sell off back in 2011/2012.

With this next reduction in the spectrum things are only going to be harder, technology is going to play a big part in trying to make the impact lesser but this will mean a huge amount of investment in the new digital platforms and for this to work for us, all our systems will have to be converted to the digital format as mixing analogue and digital will leave us no better off

If we don't get adequate funding and you don't adjust the criteria for funding of equipment, not only will multiple productions across all sectors not be able to run technically as they have, it could also have catastrophic consequences for us as a small business

There are a small percentage of companies that stand to lose a great deal if you do not redress the funding proposal, but it is those/us that are the RF backbone to the media/theatre/broadcast content that will be appearing on all the mobile devices that are taking up the spectrum.

I have consulted with a number of businesses that are in similar positions most are larger than ourselves and have more human resources to respond to you in far more detail than I am able to afford, as a BEIRG member I have read the response in detail and am in agreement with the majority of what is said in the document, below are some responses to the specific questions that are more personalised

Q1 Do you agree with our proposed criteria for who should be eligible for the grant scheme?

We agree with the criteria around legal operation over the last two years

We do not agree that the scheme should be limited to equipment with 50% or more of its tuning range in 700 MHz, we cannot mix and match analogue and digital systems without adverse sonic incompatibilities and as a result our clients not accepting the mixture of systems

We disagree with the proposal of PMSE using the guard band 694-703MHz as this just seems to be a way to eliminate a number of systems that would then fall outside the 50% tuning range criteria leaving us worse off.

We do not agree with the date deadline as having to maintain long standing jobs that are using 700Mhz kit we are subject to system failures or damages that have to be replaced to maintain the show/event

Q2 Do you agree with our assessment of the impact clearance will have on equipment which operates exclusively below 694 Mhz?

No we don't agree with your assessment, in short we are going to be forced to change all our equipment, which includes sub 694Mhz systems, to the digital platform as it is not sonically acceptable to mix analogue and digital. If we were not vacating the 700 MHz spectrum in the timeframe given we would have made this change at our own pace to match our financial capabilities.

Q3 Do you agree with our analysis of the impact clearance will have on equipment which straddles the 700 Mhz band and the spectrum below 694 Mhz?

No

There may be some users that won't be affected by this but those that are supplying into your "7% of Events" category, Hand Held being one of those, we would be very disadvantaged, given the spectral efficiency that will be required when 700MHz has been cleared the larger users are going to be forced to replace all their hire stock

Q4 Do you have any evidence that an alternative boundary for the tuning range of equipment should be drawn?

Yes,
Given we fall into the category of a business that will be majorly affected by the clearance (7%) we believe all equipment ranges (470-790) should be funded.

Q5 Do you agree with the proposed formula to estimate the level of funding?

NO

Arguments are clearly spelled out in the BEIRG document.

You are not taking into account all the related work that will be required in terms of man hours to re-stock, re programme software systems and all stock management systems, these costs are unforeseen and not desired but are being forced upon us.

You have also not taken into account any of the accessories that run in tandem with the equipment being surrendered most of which will require replacement, these are Microphone heads, Battery packs, flight casing, all of these items are going to add to the financial burden being forced upon us

Given we will have a 53% shortfall on equipment that would have still had a lengthy return period, this could have catastrophic consequences to our business

Q6 Do you agree with our approach to calculating asset life?

We don't believe asset life should be a factor in the calculations as this only serves to accelerate the end of life of a piece of rental kit, if this were not happening we would still be renting the items.

Q7 Are you aware of any developments which would mean data from the 2013 equipment survey or the 2010 Ch 69 statement are likely to misrepresent average life.

Yes, The older analogue systems that we have operating in the 700MHz band that are the exact same models as the 800MHz kit surrendered, is still in demand and in use daily, if we still had the 800MHz kit in our hire stock it would still be a very rentable item

Q8: Do you agree with the use of an average asset age for the estimation of funding entitlements? If not, do you have any suggestions for an alternative approach?

No
As per Beirg Doc

Q9: Are we correct in our assumption that a large proportion of PMSE equipment owners will not have evidence of when they purchased their equipment?

Yes

Q10: Do the data in the 2013 equipment survey provide a reasonable basis for calculating average equipment age? If not, do you have an alternative approach for gathering relevant data for making this calculation?

As per Beirg doc

Q11: Do you have any comments on our proposals for how the claims handling process should operate?

As per Beirg doc

To Conclude:

We appreciate the opportunity to respond to the document you have produced, I would hope Ofcom and the Government will equally show us some respect and listen to a small group of professional people that have a wealth of knowledge and understanding of how its industry has worked for many years and in that dedication realise the big contribution to UK PLC it makes.

Be careful you don't kill off a part of an industry without which you will have a lot less content for your mobile data friends!!