

BBC response to the Ofcom consultation on Updating Wireless Telegraphy Licence Exemptions

27 March 2025

Introduction

The BBC welcomes the opportunity to comment on this proposal by Ofcom to update Wireless Telegraphy Licence exemptions, specifically the introduction for some Audio Programme Making and Special Events (PMSE) equipment.

Currently the range 823-832MHz is licensed for audio PMSE with a UK Wireless Microphone (UHF) licence which also authorises use of 606.500MHz to 613.500MHz (Channel 38) and 1785-1804.8MHz, all on a shared basis between licensed users without priority.

Of these three ranges by far the greatest use is of Channel 38 by all sectors of the creative industries as well as the BBC and its programme suppliers. This is due to its UK wide availability without the need for co-ordination for low power wireless microphones. Lower profile productions use it satisfactorily without issue and it is also particularly valued for newsgathering purposes. Although they do not formally co-ordinate, prominent news organisations still maintain a “gentlemen’s agreement” to co-ordinate between themselves their use of spot frequencies when operating in close proximity.

The range 1785-1804.8MHz is very little used by PMSE. There is virtually no available equipment and it is not used by the BBC. Making this range licence exempt in the UK may encourage further manufacturers to develop equipment and it might become more attractive for lower profile use when co-ordinated frequencies are not required.

The range 823-832MHz was made available for audio PMSE after the 800MHz Clearance following an EU decision in 2014 and CEPT Report 50 produced in FM51. The EU required Member States to designate and make available additional spectrum for wireless audio PMSE. The spectrum range, known as the ‘duplex gap’ located between IMT services, is of lesser quality compared to the 800MHz spectrum lost. Due to the unpredictable nature of IMT interference it is unsuitable for high profile audio PMSE, though it can be employed for short range temporary use. Wireless microphone and monitor equipment is readily available in 823-832MHz and the BBC is already using it for newsgathering, often alongside Channel 38, given both bands can be used UK wide without co-ordination.

The BBC has no objection to introducing licence exemption for 823-832MHz and 1785-1804.8MHz, harmonising the UK regulatory framework with that of other countries. It is unlikely to make a material difference to the use of these two bands, given that they are already available for un-co-ordinated use. There could even be benefit in exempting 823-832MHz, given PMSE users may migrate from Channel 38 (where they still require to purchase a licence) resulting in Channel 38 becoming less congested.

The designation of the range 823-832MHz in Rec 70-03 for audio PMSE only and not other types of Short Range Device (SRD) is also an important distinction. It elevates the utility of 823-832MHz for wireless microphones and in-ear monitors over other SRD ranges such as 863-865MHz in which further types of SRDs are permitted in addition to wireless microphones resulting in a greater risk of interference.

The BBC does not support further alignment and exemption of Channel 38 or the remainder of 470-694MHz in the UK as is currently the case in many other countries which already have less stringent licensing for wireless microphone bands. The BBC and the wider creative industries highly value Ofcom's continuing role in co-ordinating wireless microphone assignments, particularly in the UHF and aeronautical band. It is a licensing structure that minimises interference risks across the hugely valuable creative industries for which the UK is internationally recognised.

Question 1: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCA to include 5G devices? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 2: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCV to include 5G terminals? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 3: Do you agree with our proposals to introduce new licence exemptions for (i) Indoor Security Scanners and (ii) Audio PMSE devices? Please

give reasons and provide evidence that supports your comments on the proposals.

In relation to Audio PMSE devices the BBC agrees with the proposals to introduce licence exemptions for 823-832MHz and 1785-1804.8MHz.

Question 4: Do you agree with our proposals to amend the technical conditions for various SRDs as set out in this document? Please give reasons and provide evidence that supports your comments on the proposals.

The BBC welcomes the introduction of the new equipment category of 'audio PMSE' to characterise wireless microphones, in-ear monitors and other audio transmission devices essential for high-quality audio capture and transmission. It serves the purpose of clearly distinguishing them from other types of Short Range Device.

Question 5: Do you have any additional comments on our proposed changes to the licence exemption for SRD equipment?

No comment

Question 6: Do you agree with our proposal to introduce new licence exemptions for Radiodetermination, Location Tracking, Tracing and Data Acquisition, Vehicle applications and High Power Indoor-only applications in the 6-8.5 GHz band? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 7: Do you agree with our proposal to amend the existing licence exemption for generic UWB devices to make clear that the use of UWB in an aircraft, road vehicle or a train are not in scope of the exemption? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 8: Do you have any additional comments on our proposed changes to the licence exemption for UWB equipment?

No comment

Question 9: Do you agree with our proposals to introduce a new licence-exemption for Group B AMRDs in Channel 2006? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 10: Do you agree with our proposals to introduce a new licence exemption for very low power maritime radios operating in an on-land training setting to be made licence-exempt? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 11: Do you agree with our proposals to extend the existing licence exemption for testing and development under suppressed radiation conditions? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 12: Do you agree with our proposals to extend the application of Regulation 7 of the 1989 Regulations i.e. that equipment users must conduct measurements to ensure that their equipment does not exceed the limits on spurious emissions, to anyone relying on the proposed exemption in the additional bands. Please give reasons

No comment

Question 13: Do you have any other comments on our proposals to make amendments to the licence exemptions for this testing equipment?

No comment

Question 14: Do you agree with our proposals to extend the existing exemption for radio equipment operated by visiting amateur radio users, to cover use by those on short visits from countries with which we have bilateral reciprocal licensing agreements?

No comment

Question 15: Do you agree with our proposals to define a temporary visit as a maximum period of three months? Please give reasons and provide evidence that supports your comments on the proposals.

No comment

Question 16: Do you agree with our proposal to introduce a new licence exemption for Fixed Wireless Access equipment operating in the 5725-5850 MHz band? Please give reasons and provide evidence that supports your comments on the proposals.
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No comment
