

Response to Ofcom's proposed Plan of Work 2024/25

Shure would like to thank Ofcom for the opportunity to comment on its proposed Plan of Work 2024/25.

Next year Shure will celebrate its 100th year as a leading manufacturer of high-quality, innovative audio products which include wireless microphones and in-ear monitors (IEMs) used worldwide by Programme Making and Special Events (PMSE) applications for broadcast and film production, and professional live music.

PMSE sits at the start of a complex value chain. Reliable access to sufficient and suitable spectrum that meets PMSE's specific requirements enables the creation of flawless content that is delivered to consumers on a variety of platforms. In the UK it underpins the largest creative industry in Europe,^{1 2} drives a booming global export market, and engages more enterprises and employees than any other non-financial sector.³

Ofcom's Plan of Work highlights innovation in spectrum sharing as a central theme. PMSE has for many years exemplified what it means to be an innovative spectrum sharer. It typically operates at comparatively low power and uses only the spectrum it needs, in the places and at the times it is required. Shure's development of Wireless Multi-channel Audio System (WMAS) technology and the associated ETSI standard demonstrates our ongoing commitment to spectrum efficiency. **However, innovation alone will not be able to mitigate further reduction in PMSE's access to suitable spectrum.**

Referring to the review of the future of TV distribution, DSIT's 2023 Spectrum Statement acknowledged that, 'spectrum management decisions involve complex trade-offs and a consideration of economic and wider political or social value derived from spectrum use'. It also specifically referenced PMSE (which is absent from Ofcom's Plan of Work) noting that, 'regardless of changes to viewing habits, there will be an ongoing requirement for spectrum for PMSE which uses, among other bands, spectrum in the 470 – 694 MHz band'.⁴

Shure would like to acknowledge Ofcom's support for PMSE and its constructive ongoing engagement with the sector. We were among the first manufacturers to develop audio equipment for the 960 MHz band. We note, however, that new spectrum for audio PMSE in the 960 MHz band was identified to **complement** the core 470 – 694 MHz band, not to replace it. Its identification followed detailed impact analysis which concluded that additional spectrum was required to mitigate PMSE's loss of access to the 700 MHz band and to accommodate continued growth in PMSE spectrum demand at the largest

¹ EY, *Rebuilding Europe: The cultural and creative economy before and after the COVID-19 crisis* (<https://www.rebuilding-europe.eu>).

² The UK creative economy accounted for 3.1 million jobs by 2018 (10% of total UK employment) and is forecast to account for 4.3 million jobs by 2030. Prior to Brexit, the UK accounted for 20% of the EU cultural and creative industries' total turnover of €128.6bn - Deloitte, *Future of the Creative Economy* (<https://www2.deloitte.com/uk/en/pages/technology-media-and-telecommunications/articles/the-future-of-the-creative-economy.html>).

³ Enders Analysis, *UK's Creative Industries: Boosting the regional economy* (<https://www.endersanalysis.com/reports/uks-creative-industries-boosting-regional-economy>).

⁴ <https://www.gov.uk/government/publications/spectrum-statement/spectrum-statement>

events. We therefore urge Ofcom to continue to advocate for the retention of PMSE's access to the 470 – 694 MHz band, not just in the UK but internationally, to protect the economies of scale that PMSE equipment manufacturers require.

WRC-23 showed that PMSE continues to face the threat of further loss of its primary spectrum resource for wireless mics and IEMs in the band 470 – 694 MHz, having in the last decade already endured the disruption of successive clearances of first the 800 MHz band, and more recently the 700 MHz band. Though largely deferring further decisions concerning the band until a later date, WRC-23 nevertheless introduced via new Radio Regulation footnotes the risk of fragmentation of the core audio PMSE band in Region 1.

Against this background, two of Ofcom's stated outcomes regarding 'Enabling wireless services in the wider economy' – those of 'making spectrum available to enable the communications industry to meet anticipated growth in consumer mobile and wireless services', and of 'making spectrum available to meet the specialised needs of key sectors' – look increasingly incompatible. Further substantive changes in the 470-694 MHz range could involve a trade-off of the kind described by DSIT. In those circumstances an alternative additional spectrum access arrangement for PMSE would be required that avoids constraining the growth of industries it supports.

It would rely on novel thinking that recognises and protects PMSE's intrinsic value as a stand-alone application, irrespective of the platforms via which its output is distributed, and which properly considers the socioeconomic benefits derived from the UK's world-class content creation. Shure is available to discuss some of the options further with Ofcom and thanks Ofcom for providing this opportunity to respond.