

## **High power PMSE applications in the lower two MHz of Channel 38**

The BBC is grateful for the opportunity to respond to Ofcom's consultation document on high power PMSE use of channel 38.

We do not have any significant comments to make on this proposal. There are clearly some difficulties in facilitating high power PMSE users in alternative spectrum, such that it would meet their requirements for UK-wide access. However, Ofcom are also right to point to the increased risk of harmful interference to low power users if its proposal were to be confirmed.

As a result, we would suggest that Ofcom and JFMG adopt the same approach (as far as possible) with Channel 38 as it did with Channel 69 – namely to interleave the high power frequencies with low power spot frequencies.

Ofcom will be aware that JFMG recently designed an “informal” band arrangement in Channel 38 whereby broadcasters would agree to use set frequencies for their low power wireless microphone use. We believe there would be some merit in ensuring that the two high power allocations are set to avoid those frequencies.

This approach does not seek to undermine the status of Channel 38 as a flexible band for wireless microphone users. It would, however, minimise the risk of interference to existing use.