BEIRG Response: Programme Making and Special Events

High power PMSE applications in the lower two megahertz of Channel 38 (606-614 MHz)

Introduction

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, circuses, schools, live music, 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.

The economic and social importance of PMSE, and the creative industries which rely on it, is growing. In the UK the creative industries are currently responsible for 1.5 million jobs, and contribute £36 billion annually to the UK economy. While PMSE is growing in size and importance, the access to spectrum which is the life blood of its operations is being steadily eroded. Without access to sufficient quantity and quality of spectrum, the PMSE sector's ability to produce content for consumers is severely restricted. It is essential to recognise that any interference to PMSE usage poses a serious risk to the revenue generation of this sector. As interference affects PMSE content production at its live source, industry users will be directly affected and face a huge potential loss of earnings and consumer reputation.

In any production uninterrupted access to spectrum is crucial, and while low power PMSE operates invisibly, it operates constantly across the UK. Any disruption in spectrum access can result in far wider implications for productions as a whole, having severe consequences for both the event and the audience alike.

Question 1: Do you agree with our proposal to allow high power PMSE use on 606.7 MHz and 607 MHz at a maximum of 10 W ERP?

BEIRG cautiously welcomes Ofcom's proposal to allow high power PMSE use between 606.7 MHz and 607 MHz. BEIRG recognises that this is being proposed to bring Channel 38 in line with what was available in Channel 69, however questions the need for this change, given that higher powered PMSE devices can operate in interleaved spectrum. BEIRG also seeks reassurance that there is no intention to remove access to interleaved (A.K.A. DTT whitespace spectrum) for higher powered devices, if access to Channel 38 is granted.

The main concern BEIRG has is the potential threat of interference that allowing high powered users to operate in Channel 38 could present to other PMSE users. The impact on programme makers who use conventional, low power radio microphones is not adequately addressed. BEIRG can envisage difficulties at busy events where, for example, a large quantity of journalists are all attempting to report from the same location, or where a show is running that is reliant upon multiple wireless mics, IEMs, and access to a compatible set of frequencies. It is unrealistic to expect that all existing low power users will be able to retune their equipment to somewhere else within the reduced 6 MHz range. Indeed, users who operate multiple radio mics or IEMs will be unable to fully retune to another frequency channel in Channel 38.

Ofcom's example of the Open Golf Championship as a major venue for use of high power microphones claims that the two Channel 38 link frequencies in question will be able to satisfy demand for spectrum. However, with only 300 kHz of separation between the proposed frequencies, it would be very difficult for users to employ both frequencies at the same time, and result in extensive interference issues. Currently, over twenty five high power links are routinely assigned at the Open Golf Championship, and demand for high power microphones at major events is met through utilisation of DTT whitespace spectrum. While it is not possible for PMSE users to always secure the same spectrum frequencies, and therefore rely on the same equipment at every event, this fact is accepted by low power PMSE users who must operate flexibly according to their location and the functioning TV services in the area. Exclusive spectrum is very hard to come by, and access is squeezed across all Channels, not just 38. DTT broadcasters and consumers could experience an impact on reception in Channel 37 from high power PMSE operations.

Given the much greater use of low power PMSE in this channel as compared to the demand for high power links, BEIRG believes that this resource should be protected for low power PMSE users. BEIRG would advocate a phased introduction of a limited number of high power users. This would then allow Ofcom to see what the potential for interference will be, and whether low power PMSE users will be able to retune their equipment as easily and trouble-free as the proposal suggests. BEIRG also believes that high power operations in Channel 38 should only be a 'last resort' after all other deployment in interleaved spectrum options have been exhausted. Of course, if problems are encountered then BEIRG believes that this facility will need to be withdrawn and the relevant issues re-addressed, with an alternative solution for high power PMSE users.