

## **British Entertainment Industry Radio Group (BEIRG)**

**Response to Ofcom consultation “Licence Exemption of Wireless Telegraphy Devices: Proposed Changes”**

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## **British Entertainment Industry Radio Group (BEIRG) response to Ofcom consultation “Licence Exemption of Wireless Telegraphy Devices: Proposed Changes”**

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. Productions that depend on radio spectrum include TV, film, sport, theatre, 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.

BEIRG is extremely concerned about moves to extend licence exemption to Mobile Satellite Systems (MSS) handsets to the 1518 to 1525 MHz band which could result in the exclusion of PMSE from the band, as this band is currently shared with PMSE applications. There are currently discussions in Europe within FM51 on the harmonisation of spectrum allocations for PMSE users. As PMSE allocations in the UHF bands are currently being reduced, the L Band has been suggested as a potential target for harmonised PMSE services. PMSE services have been cleared from the 800MHz band for mobile applications, there is uncertainty around the 600MHz band, and now discussions on removing PMSE from 700MHz and allowing unlicensed WSD into all other PMSE UHF spectrum.

In light of all these discussions and developments, it is unwise for Ofcom to open this band up to other services, without considering PMSE use. BEIRG believes that until any decision has been made on the use of the L Band for PMSE by Europe, there should be no changes made to the licence exemptions in 1518-1525MHz. BEIRG believes the whole of the L Band should be harmonised across Europe for dedicated PMSE use. This would go some way towards meeting the requirement of 96MHz of spectrum required for PMSE operations to be maintained. BEIRG also hopes that Ofcom is taking part in European discussions on the future harmonisation of the 1.8GHz band for PMSE; at present this band is not available throughout the UK and is only available for fixed site licences. The entertainment industries demand for PMSE services, and for the spectrum to operate these services, is growing as production values increase. Whilst PMSE manufacturers are looking to further increase the efficiency and quality of the devices on the market, this will not replace the industry's need for access to sufficient quantities of interference-free spectrum. BEIRG believes that until there is a reassurance that the PMSE industry will have sufficient spectrum for long term use, no changes should be made to the 1518-1525MHz band licencing arrangements.