



Consultation: The Future use of UHF Spectrum in Bands IV & V

The IBS is a body representing audio professionals working primarily but not exclusively in radio and TV broadcast audio.

During the past six years we have been part of the PMSE industry body liaising with OFCOM on the DDR and DSO and their impact on PMSE activity throughout the UK.

We are therefore most disappointed to see that in this latest consultation from OFCOM there is no mention of PMSE as a current major user of UHF bands IV & V. In the diagram on page 3 the single channel 38 identified for PMSE use is most misleading. As OFCOM should already know, PMSE activity runs right across the whole of the UHF band from channel 21 – 30 and channel 38 – 60.(Post DSO) This access is managed by the band manager JFMG Ltd on a licensed basis utilising what is commonly called the Interleaved Spectrum but now often called White Space. PMSE access to this spectrum has existed for many decades and as the PMSE industry made plain to OFCOM during the DDR discussions it is essential that this spectrum is retained for PMSE's continued use as current and foreseeable technological developments will not enable PMSE to utilise other spectrum with the same efficiency that is currently available.

PMSE is able to exist in the UHF bands IV & V largely because it co-habits the spectrum with what is now called DTT services. It has to be stated that UK consumers will not take kindly to having to make further changes to their broadcast TV equipment having just equipped themselves for DTT should OFCOM consider removing DTT from its current spectrum allocation in the future. To consider supplying broadcast TV services via cable and/or wireless broadband is not a realistic economic option for the UK given the geographical nature of population distribution. Fibre optic cabling to small rural communities is already discounted in the current UK broadband debate on cost terms alone.

In the consultation mention is made of future international harmonisation particularly with reference to the 700 MHz band. If this development is introduced in the UK, the resulting loss of the current DTT spectrum would cause a major reduction in available PMSE spectrum as well. This does not make economic sense given the importance of the PMSE industry to the UK entertainment and media industries. Following DSO the PMSE industry is already seeing a deficit in available spectrum when compared to that available with analogue broadcast TV services so the removal of the 700 MHz block would create a serious problem for PMSE services. It is already being challenged in the existing interleaved spectrum surrounding DTT with the possible introduction of so called license exempt cognitive White Space Devices.

It has to be said that the modern telecoms industry with its access to enormous financial and technological resources is better placed to develop access to other available spectrum rather than the already crowded UHF bands IV & V. The PMSE industry that currently uses these bands does not have those same resources to migrate elsewhere in spectrum terms.

In conclusion while accepting that technology is always advancing and who knows what is over the horizon, it must be stated clearly that the existing UHF bands IV & V allocations must be safeguarded for as long as is humanly possible for the sake of existing consumers and UK plc.

Malcolm Johnson

On behalf of the Chairman and Executive Committee of the IBS.

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