



1. Company Profile

JFMG Ltd is the dedicated band manager for programme-making, entertainment, special events and related activities. It is a privately owned company created specifically to ensure continued and equitable spectrum access to all areas of the programme-making industry.

JFMG successfully coordinates the use of spectrum, issues licences and collects licence fees on behalf of Ofcom, and has done so since 1997. The spectrum we manage ranges from 47 MHz to 48 GHz and requires expert knowledge of the bands, their uses and restrictions. This includes the spectrum within Ofcom's Digital Dividend Review and the interleaved spectrum.

In the UK, the professional use of radio for programme making and entertainment purposes is referred to as Programme Making and Special Events (PMSE). PMSE applications include:-

- Broadcast television studio production
- Broadcast television and radio coverage of news, sport or other public events including state occasions
- Theatre and touring shows (e.g. Doctor Dolittle, Cirque du Soleil)
- Music and other entertainment productions (e.g. Live8, Mandela, Glastonbury, T in the Park)
- Motor sport communications and remote monitoring (e.g. F1GP, Moto GP)
- Conferences, and corporate presentations and events
- Movie film productions

JFMG Ltd facilitates the successful running of these events. JFMG also provides on-site consultancy services and is committed to leading the industry through the transitional period ahead.

3. Consultation questions

Q1: What are your views on Ofcom's proposed priorities for 2011/12?

JFMG has views on the following proposed priorities for 2011/12:

- i) Preparing for auctioning of the 600 MHz, 800 MHz and 2.6 GHz spectrum bands
 - Whilst we are aware that Ofcom plans to start the auction for awarding the licences to use the 800 MHz band by the end of 2011/12 or early in 2012/13, JFMG is keen for Ofcom to confirm the final date for when PMSE users will need to vacate 790-862 MHz. This will enable us to better advise and manage the migration of PMSE users from the 800 MHz band.

- JFMG would like to see a band edge agreement for boundary conditions at 790 MHz.
- JFMG also asks that access to the 2.6 GHz bands continues as long as possible, through the auction itself and until the spectrum is needed by the winners. This is particularly important for locations such as London and for large events where the loss of the band will be acutely felt. For major events such as the Ryder Cup and the Royal Wedding it would be more difficult to accommodate the current level of demand for wireless cameras once the 2.6 GHz band is lost to programme-making.
- Finally, we would like a band edge agreement in place for PMSE and other service protection at either end of the 600 MHz band.

ii) Deliver the government's guarantee of wireless spectrum for the London 2012 Olympic and Paralympic Games

JFMG supports Ofcom in recognising the contribution of services not covered by the UK government's spectrum guarantees to the success of the London 2012 Games and the importance of 'day-to-day' services.

Q2: What are your views on Ofcom's proposed work areas for 2011/12?

JFMG has views on the following proposed work areas for 2011/12:

- i) Review of Ofcom's management of fixed-link services spectrum
In respect of Ofcom's management of fixed-link services spectrum, JFMG is keen for Ofcom to ensure that there is continued sustainable access to existing PMSE fixed links bands.
- ii) Spectrum enforcement
JFMG appreciates the priority to 'safety-of-life' services and the need to deal with pirate radio and Business Radio issues. JFMG would also like to continue to encourage and support Ofcom's field presence in relation to programme-making, something that the PMSE community has indicated that they would welcome.

Additional comments

Section 7.5 of the consultation document emphasises that Ofcom monitors radio spectrum and takes the appropriate action to prevent harmful spectrum interference. It acknowledges increasing demand and the corresponding increase in risk of interference whilst modernising its resources to prevent and mitigate interference when it occurs. JFMG supports Ofcom's approach and would like to work with Ofcom to particularly focus on interference issues in the PMSE sector.