

BBC Response to Release of 2010-2025 MHz

Introduction

The BBC welcomes the opportunity to respond to this consultation.

We have been concerned for several years now about the future availability of spectrum used in newsgathering and in covering events of major cultural or sporting significance, including the London Games, in the light of Ofcom's programme of spectrum awards. We are therefore part of the Spectrum for Programme Makers Forum (SPMF), an industry body comprising broadcasters, news agencies, hire companies and equipment manufacturers, which seeks to ensure sufficient spectrum remains available for use by wireless microphones and wireless video cameras and, for the BBC, radio cars.

The questions in Ofcom's consultation document are responded to below.

Question 1. Is there demand to use the band for wireless cameras?

The BBC would like to use the band for wireless cameras. We believe that there is demand to use this band for wireless cameras from other broadcasters and news agencies too, based on comments they have made in the past.

Question 2. Is there demand for other uses of the band?

The BBC does not feel in a position to meaningfully comment on this question.

Question 3. How might demand for the band change in the foreseeable future?

With regards to its use for wireless cameras, the BBC believes that demand for this band is likely to increase, given increasing demand for use of wireless cameras, and the reduction in the supply of suitable spectrum (as a result of Ofcom's awards of spectrum).

Question 4. Should any wireless-camera use of the band be licence-exempt?

The BBC does not believe that any wireless camera use of the band should be licence-exempt. We believe that, as per the 2025-2110 MHz band, 2010-2025 MHz should be licensed, in order to avoid the increased risk of harmful interference. Use of the band will also need to be coordinated by a band manager, in order to maximise efficient use.

Question 5. Should any other use of the band be licence-exempt?

We do not believe that any other use of the band (should such uses exist) be licence-exempt, in order to avoid the increased risk of harmful interference to adjacent PMSE use. Licensing use will also encourage sharing of the band, thereby maximising efficient use.

Question 6a. If we allocate the band to PMSE, is there good reason not to set TLCs to allow all of 2010-2110 MHz to be treated as a single band?

Question 6b. If so, what TLCs should we set?

The BBC strongly supports setting of TLCs which allow all of 2010-2110 MHz to be treated as a single band. The addition of the spectrum from 2010-2025 MHz will support an additional two wireless cameras in 10 MHz channels, thereby maximising efficient use.

Question 7a. If we allocate the band to PMSE, is there good reason not to provide the same security of tenure as for other PMSE-allocated bands?

Question 7b. If so, what security of tenure should we provide?

If 2010-2025 MHz is allocated to PMSE, it is difficult to see any reason for not providing the same security of tenure as for other bands allocated to PMSE.

Question 8a. If we allocate the band to PMSE, is there good reason not to set fees for access on the same basis as most of the spectrum at 2-3 GHz used for wireless cameras?

Question 8b. If so, how should we set fees for access?

In the light of Ofcom's estimate of a zero opportunity cost for most of the spectrum at 2-3 GHz used for wireless cameras, it is difficult to see why fees for access to 2010-2025 MHz should not also be set on the basis of administrative costs.

Question 9a. If we do not immediately decide to allocate the band to PMSE, is there good reason not to allow temporary use for wireless cameras in line with our approach to the 2290 MHz band?

Question 9b. If so, what should we do until we make and implement our decision on the best way to release it?

If the decision is taken not to allocate the band to PMSE, it is difficult to see any reason for not allowing temporary use for wireless cameras, in line with Ofcom's approach to the 2290 MHz band.

Question 10. Do you agree we should make the 2010 MHz band available for the Olympics?

The BBC agrees that this spectrum should be made available for the duration of the London Games (for use by wireless cameras), but that flexibility is retained as to what sort of coverage may be provided with it.

Given the limits on spectrum availability at 2.0 and 2.2 GHz, which broadcasters currently use in newsgathering, and given that broadcasters will need to continue to cover (non-Games-related) news during the Games, 2010-2025 MHz should remain open to be used in newsgathering.

As the SPMF has already stated to Ofcom, the 2.0 and 2.2 GHz bands will need to continue to be available for newsgathering for the duration of the Games (and hence should not be included in the 149 channels that Ofcom is likely to need to make available for Games coverage).

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