

Response to Ofcom Consultation: Digital Dividend: Release of 2010-2025 MHz Consultation on potential uses

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 have done so since 1997. The spectrum we manage ranges from 47MHz to 48GHz 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.

2. Consultation Questions

Demand

Question 1): *Is there a demand to use the band for wireless cameras?*

There is a significant demand to use the 2010-2025 MHz band for wireless cameras. The band has already been used to support major events in the UK during 2009, including the Formula One Grand Prix at Silverstone and the Open Championship at Turnberry.

Also, the imminent withdrawal of the 2.6GHz band (2500-2690 MHz) from PMSE use will mean that other events are likely to experience congestion in the 2GHz bands. The availability of the 2010-2025

MHz band will help mitigate the closure of the 2.6GHz band by potentially yielding an additional two 10 MHz channels for digital wireless cameras and other digital video links to use.

Some of the equipment in use today will be able to use these frequencies immediately without any modification.

Question 2): *Is there a demand for other users of the band?*

No comment.

Question 3): *How might demand for the band change in the foreseeable future?*

As described in JFMG's response to Question 1, PMSE demand for the 2010-2025 MHz band is likely to increase in the future as the 2.6GHz band (2500-2690 MHz) is withdrawn from PMSE use.

Question 4): *Should any wireless-camera use of the band be licence-exempt?*

From a PMSE perspective, JFMG does not believe that any wireless-camera use of the 2010-2025 MHz band should be licence-exempt. This is because PMSE use is typically for live video transmission for broadcast or other entertainment production where a guaranteed quality of service is required. Also, PMSE generally requires higher power than would typically be available under licence-exempt regime. The adjacent band at 2025-2110 MHz is used for wireless cameras as well and also for higher-power digital links. To ensure the most efficient and effective use of the 2010-2025 MHz band and existing PMSE use in the adjacent band, it is essential to coordinate user requirements.

Question 5): *Should any other use of the band be licence-exempt?*

As stated in JFMG's answer to Question 4, PMSE use is typically for live video transmission for broadcast or other entertainment production where a guaranteed quality of service is required. Therefore, it would not be workable to mix licensed exempt applications and licensed PMSE use in the same band.

For example, although in theory PMSE use is licensable in the 2.4GHz WiFi band, in practice PMSE is not able to coexist in that band with the licence-exempt applications that use it, such as those for essential infrastructure services and production purposes at public events. These infrastructure services include ticketing, merchandising, scoring, timings and facilities for hospitality guests. The production purposes include lighting control, sound balancing and other stage applications.

Demand only for PMSE

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?*

If the 2010-2025 MHz band is allocated to PMSE, it is essential that TLCs are based on a single block of spectrum from 2010 to 2110 MHz. This will maximise the opportunity for PMSE to make the most efficient use of the band by enabling the 15MHz available to yield two 10MHz channels for digital wireless cameras and video links.

Question 6b): *If so, what TLCs should we set?*

Not applicable. See JFMG's response to Question 6a.

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?*

Currently, PMSE has uncertain security of tenure in its allocated bands. This issue was due to be addressed when the new band manager was appointed.

Ofcom published a statement on 15 April 2010 announcing that the band manager award had been deferred until after the Olympics. Despite this, Ofcom indicated that it is committed to providing greater security of tenure for PMSE users. The statement went on to identify security of tenure as critical to a functioning market for PMSE spectrum access and to highlight that it had appeared as a key issue for users during the band manager consultations. Users argued against a fixed cut off date for band manager obligations in 2018 because equipment lifecycles often exceed ten years and because the date would act as a cliff-edge, creating uncertainty in the market as it approached.

JFMG believes that if the 2010-2025 MHz band is allocated to PMSE, PMSE users should have the same security of tenure in this band as they do in other PMSE-allocated bands and any future changes to greater security of tenure in the other bands should apply to the 2010-2025 MHz band as well. It is important that security of tenure of the 2010-2025 band, if allocated to PMSE, is addressed alongside the other PMSE-allocated bands.

Question 7b): *If so, what security of tenure should we provide?*

Not applicable. See JFMG's response to Question 7a.

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?*

JFMG believes that it is essential to have a consistency of fees across substitutable bands so therefore thinks that the fees should be set in the same way as the rest of the spectrum at 2-3 GHz that is used for wireless cameras.

Question 8b): *If so, how should we set fees for access?*

Not applicable. See JFMG's response to Question 8a.

Other demand

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?*

JFMG believes that temporary use of the 2010-2025 MHz band by wireless cameras should be allowed if the band is not immediately allocated to PMSE.

If temporary access is granted then some of the PMSE equipment in use today will be able to use these frequencies immediately without modification.

Also, the current coordination arrangements including online licensing can be extended to cover the 2010-2025 MHz band easily and so enable spectrum to be utilised that would otherwise be empty.

If necessary, the temporary access could be withdrawn at any time with limited notice.

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

Not applicable. See JFMG's response to Question 9a,

Olympics

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

In planning for The Games, it is essential that Ofcom strikes a balance between meeting the demands of the Olympic partners and also accommodating all other requirements for PMSE use, especially in London. Therefore, if this spectrum is to be included in the Olympic spectrum plan then it must not be sterilised from other uses.

During the London 2012 Games, it will be necessary to meet the overall demand for wireless cameras and video links arising from:

- 1) Olympic partners
- 2) Non-accredited broadcasters
- 3) The cultural Olympiad
- 4) Business as usual PMSE use



Inevitably, the peak demand will occur in those 'hot-spot' parts of the spectrum that are available by allocating individual channels for a particular use such as business-as-usual PMSE use. But through careful coordination and consideration of what type of technical use individual channels are deployed for, then channels could be re-used to better meet the overall demand.