



Your Association with Expertise

CONSULTATION: Digital Dividend Review: clearing the 800 MHz band

Consultation Deadline: 20 April 2009

Respondent: PLASA (Professional Lighting and Sound Association)

Introduction to PLASA (Professional Lighting and Sound Association)

PLASA is the lead professional body for those who supply technologies and services to the event, entertainment, communication and architectural industries. PLASA has a membership of over 550 members worldwide, including the leading specialists in professional audio, lighting, AV, staging, communications and related disciplines.

Question 8. Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?

The spectrum that is offered as a direct like-for-like replacement for channel 69 should at least replicate the current benefits of channel 69, including UK-wide availability, ability to licence UK-wide, interleaved spectrum available in adjacent channels (at least as much as in channels 67 and 68) and no interference from out-of-band users. In addition to these benefits, the replacement spectrum should have a low opportunity-cost but still be of sufficient bandwidth to allow the PMSE sector to operate at current and anticipated levels post-DSO. In this regard, Ofcom's revised white space maps have still not been published. As a consequence, it is still impossible to know for certain whether the frequencies included in the package of spectrum to be awarded to the band manager will be sufficient to meet the PMSE sector's needs. Indeed, BEIRG's models based on existing data suggest that there will be significant problems. In absence of the refined data, Ofcom should not do anything that precludes them from being able to redress any shortfalls (whether in terms of bandwidth or continuity) in post-DSO (Digital Switchover) PMSE spectrum. We also urge Ofcom to produce white space maps for the post-DSO interleaved spectrum as soon as possible, including in channels 39 and 40. This much-needed certainty will allow PMSE manufacturers and users to plan for the future. It is also needed for potential band-managers for business planning purposes in the lead-up to the beauty contest.

Question 11. Do you agree that channel 38 is the best alternative to channel 69 for PMSE?

We believe that, of the options that Ofcom seem to have considered, channel 38 offers the best direct like-for-like replacement for channel 69 (though until interference problems have been thoroughly assessed it is impossible to state this definitively). It will be available on a UK-wide basis by 2012, has a low opportunity-cost (and hence licence-fee attached to it), has a bandwidth of 8 MHz and lies in closer proximity to post-DSO (digital switchover) interleaved spectrum than channel 69 will. None of the other options considered by Ofcom have all of these benefits. The interleaved spectrum is not available UK-wide and would not offer any additional bandwidth. Channel 70 will be more isolated than channel 69 and would offer no additional



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bandwidth. The FDD duplex split will not necessarily exist or be useable for PMSE. The 1785-1800 MHz band is not available UK-wide, it is too isolated from the interleaved spectrum and there are equipment availability issues. The 870-876 MHz and 915-921 MHz bands are too isolated from interleaved spectrum (frequency proximity) and there are interference issues posed by the GSM bands nearby.

However, channel 38 does not currently offer a like-for-like replacement for channel 69 and, until it does, users have no option but to go-on buying channel 69 equipment. Under current proposals, those who buy channel 69 equipment subsequent to the publication of the consultation document will not be entitled to financial assistance. This has led to a severe decline in sales of channel 69 equipment; businesses and jobs are consequently under threat.

In light of these concerns, Ofcom must take the following action

1. Announce as soon as possible that channel 38 will be allocated to PMSE.
2. Remove all availability and licensing restrictions that currently apply to channel 38 as soon as possible so that the benefits of channel 69 are replicated and it offers a viable alternative. In particular, channel 38 equipment must be useable UK-wide without interference and covered by a single 'shared' licence.
3. Strongly encourage the Government to make provisions for those that have purchased and will need to purchase equipment before replacement options are confirmed and available. For example, the Government could indemnify those demonstrably necessary and reasonable investments but were risky due to regulatory developments, spectrum availability issues or uncertainty.

Question 12. Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?

Yes.

Ofcom should make clear that cognitive devices will not be permitted to use channel 38 and that their proposals on this matter just apply to the interleaved spectrum.

Question 13. Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months' notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?

We agree with the principle of extending PMSE access to the cleared spectrum and believe that late 2012 is the earliest point at which this access should cease. Indeed, the time needed to migrate from channel 69 to channel 38 is likely to be, as Ofcom say, three years. As this time required will start from the point at which



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channel 38 is available on the same/very similar terms as channel 69 is, it may be that PMSE users will need to retain access to channel 69 until much later than 2012 (as dictated by the extent to which radioastronomy use of channel 38 can be reduced and when).

Question 14. Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?

We are concerned that Ofcom's proposed criteria will unfairly 'miss out' those who should be entitled to financial assistance. We support and endorse BEIRG's views on this matter.

Question 15. Do you agree that three years is long enough for PMSE to move from channel 69?

Yes, provided that the 'three years' does not begin until the availability and licensing scheme of channel 38 replicates that of channel 69.