

Digital Dividend Review: geographic interleaved awards 470 - 550 MHz and 630 – 790 MHz

IBS Response to the Consultation Document.

This paper outlines the IBS reaction to the OFCOM proposals contained in the consultation document.

Before commenting directly the IBS would like to acknowledge the recent good work undertaken on behalf of OFCOM concerning interference issues that have been raised by the PMSE community in relation to OFCOM's proposals for the cleared spectrum and the likely impact on continuing PMSE activity, particularly in protecting PMSE use of channel 69. We have also noted from the consultation that should cognitive devices eventually use the interleaved spectrum they will have to operate in such a way as to provide protection to PMSE equipment.

Question 1. The executive summary sets out our proposals for the digital dividend geographic interleaved award. Do you agree with these proposals?

The IBS views with some alarm the apparent change of emphasis as contained in the consultation. While the Executive Summary does indeed mention PMSE as one of the potential users of the interleaved spectrum the emphasis on local DTT services does give rise to concern that, should they proceed as indicated, they will further restrict the availability of suitable spectrum for PMSE. It is accepted and understood that a spectrum award will be made to the band manager following their selection after the "beauty contest" and that they will be able to license UHF spectrum for PMSE use but our fear now is that the final available spectrum for PMSE will be even further constrained. OFCOM has previously announced that channels 61 & 62 will be part of the cleared spectrum auction and, more recently, the statement that by 2012 channel 38 will be cleared of radio astronomy has reduced yet again the amount of spectrum to be made available via the new band manager for continuing PMSE activity. In earlier discussions with OFCOM the Professional Users Group was given assurances by OFCOM that PMSE would have access to a similar amount of spectrum to that currently available in the analogue interleaved space. With all that has transpired in recent times, together with the publication by OFCOM of data at the beginning of 2008, current analysis by us and others (i.e. JFMG Ltd) now shows a much reduced quantity of digital interleaved spectrum that could be accessed for PMSE. We would wish to remind OFCOM that PMSE has been a preferred secondary user of much of the UHF spectrum for a number of decades and what is now being proposed is the denial of access to much of the spectrum in which the PMSE industry currently operates to benefit of UK Ltd. As we have stated before the likelihood of the PMSE community being able to enter the auction bidding process both now and in the future remains extremely unlikely particularly as OFCOM has set an initial auction deposit at £25,000.

It has always been understood that PMSE would have to share the interleaved spectrum with other users but the consultation document appears to place significant weight on the idea of local DTT services becoming established. While it is for others to determine the financial viability of future local services, in light of the current position with ITV nationally, we have to question whether this is a realistic goal. We would strongly urge OFCOM to review their digital interleaved spectrum proposals before the auction process commences in 2009.

In previous OFCOM consultations and liaison meetings with the Professional PMSE Users Group much had been made of the regulator's desire to offer protection to PMSE in the medium term and, while this is restated in this consultation document, the underlying feeling is one of gradual erosion of spectrum for the PMSE industry. We still have overriding concerns with the possible introduction of un-licensed cognitive devices into the digital interleaved spectrum and look for an assurance from OFCOM that this will not take place until

very rigorous field testing of such devices has taken place and suitable interference safeguards have been agreed and introduced.

On the subject of improved spectrum efficiency in future wireless microphones we also note and support the conclusions of a recent report, commissioned for OFCOM, by the consultants CSMG that confirm the industry's view on the subject.

We look forward to attending the September seminar on the proposals for the new band manager and will continue to contribute to the DDR process.

John Sullivan
IBS Chairman
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