

**Radio Restricted Services and 55 to 68 MHz:
Ascot Racecourse Ltd's Response to Ofcom's
Consultation**



Ascot Racecourse Ltd (ARL) welcomes the opportunity to respond to Ofcom's consultation "Radio Restricted Services and 55 to 68 MHz".

Ascot is one of the world's most famous racecourses, and Royal Ascot is amongst the most important events in the UK sporting calendar, attended by up to 80,000 racegoers on each of the five days of the meeting. The racecourse has recently undergone a high-profile and successful redevelopment costing £200 million, and was officially opened by the Queen on 20th June this year.

Radio communications are used for a wide variety of applications including private mobile radio (PMR), radio cameras and microphones and WLAN. ARL has recently invested in an audio distribution system (ADS) specifically for the Hard of Hearing (HoH) in accordance with the Disability Discrimination Act. This HoH ADS system uses the 60.75 to 62.75 MHz band and is therefore affected by the current Ofcom consultation.

ARL's manages spectrum usage at the racecourse to minimise the risk of interference.

ARL supports Ofcom's proposal to licence ADS systems beyond 31st August 2006, however we do not agree that ADS users should have no protection from interference caused by PMSE (programme making and special events) users. We support proposals to allow longer duration ADS licences and for site-based licences. We also agree that bands other than 60.75 to 62.75 MHz should be available for ADS, and would like to see other parts of the 55 to 68 MHz band released in such a way that they could be used for ADS.

Answers to specific questions in the consultation document are given below.

Question 7) Do you agree that we should license 'ADS-RSLs' once the ADS trial ends on 31 August 2006?

Yes. ARL was told by Ofcom in April 2006 that their HoH system was classed as an ADS, and that the only band permitted for ADS was 60.75 to 62.75 MHz. ARL therefore had no alternative but to purchase HoH equipment in this band. ARL would be very disappointed if this band was no longer available for the HoH system after 31st August such that we were forced to purchase new equipment.

Question 8) Do you agree with the technical characteristics of the licence? If not, what alternative proposals do you have in mind?

ARL agrees that an ERP of 1 Watt should be permitted. However we believe that ADS services should not have a lower priority than PMSE services in the band 60.75 to 62.75 MHz, since PMSE users often have a number of alternative bands available whereas ADS services do not currently.

Question 9) Do you agree with our conclusions on the potential interference issues concerning shared programme-making use of the spectrum? If you disagree, please give reasons.

Ofcom's analysis of interference issues seems reasonable, however we disagree with Ofcom's proposed approach to allow ADS on a non-interference non-protection basis. ADS services should have at least an equal priority with PMSE services in the band 60.75 to 62.75 MHz, see also response to Question 8.

Question 10) Do the current arrangements ensure that programme-making use of the sub-band at “known” events is adequately safeguarded?

We believe that ADS operators should not be precluded from obtaining a licence at any events. The proposed approach seems inconsistent with Ofcom’s aims to liberalise spectrum usage and to promote market-based regulation.

Question 11) If circumstances permit, should 'ADS-RSLs' be available for longer than five days, and if so what is/are the appropriate licence duration(s)?

Yes. ARL believes that ADS licences should be available at Ofcom’s discretion for a duration of up to 1 year. We believe also that licences should be available up to 12 months before the start of the license period, rather than 3 months as currently. This would give the site owner greater certainty to plan services and to seek alternative arrangements if the frequency applied for is not available.

Question 12) If circumstances permit, should the link between an "event" and an 'ADS-RSL' be removed to permit general "site" based licences?

Yes. This would reduce the administrative overhead of obtaining licences for specific events, and give the site owner greater certainty in planning ADS services at the site.

Question 13) Do you agree that the availability of 'ADS-RSL' licences should be extended to ‘non broadcast’ frequency bands other than 60.75 to 62.75 MHz?

Yes. The availability of other spectrum would help relieve potential congestion in the band 60.75 to 62.75 MHz.

Question 14) Do you have any comments regarding the costs and administration of 'ADS-RSLs'?

We believe the licence application and payment process should be made as simple as possible to keep costs down, for example using a pre-paid “carnet” rather than individual payments for each event.

Question 15) Do you foresee interest in accessing up to 8MHz of frequencies in the 55 to 68 MHz band that are presently almost unused, and if so for what types of service and/or technology? Do you have any views on how Ofcom might release this spectrum to the market for use?

ARL believes that other parts of the band 55 – 68 MHz should be released in such a way that the new spectrum could be used for ADS. Management by a band manager would allow the new spectrum to be used for short duration and localised events.