

British Entertainment Industry Radio Group (BEIRG)

Response to CEPT Report 50: Technical conditions for the use of the bands 821-832 MHz and 1785-1805MHz for wireless radio microphones in the EU.

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BEIRG response to CEPT Report 50

Executive Summary

- **Harmonised spectrum across Europe for PMSE is to be welcomed.**
- **The bands that are considered in this consultation should be regarded as ‘additional spectrum’ rather than ‘replacement spectrum’.**
- **The bands are highly unlikely to be suitable for professional use due to interference from LTE services in adjacent bands.**

The British Entertainment Industry Radio Group (BEIRG) is an independent, not-for-profit organisation that works for the benefit of all those who produce, distribute and ultimately consume content made using radio spectrum in the UK. Productions that depend on radio spectrum include TV, film, sport, theatre, music, newsgathering, political and corporate events, and many others. In the context of the Digital Dividend Review (DDR), BEIRG campaigns for the maintenance of Programme Making and Special Events (PMSE) access to sufficient quantity of interference-free spectrum.

The economic and social importance of PMSE, from the circus to the media and the creative industries which rely on it, is growing. In the UK the creative industries are currently responsible for 1.5 million jobs, and contribute £36 billion annually to the UK economy¹. While PMSE is growing in size and importance, the access to spectrum which is the life blood of its operations is being steadily eroded. Without sufficient access to spectrum, the PMSE sector’s ability to produce content for consumers is severely hindered.

Wireless PMSE technologies also play a vital role in helping to improve security and safety levels within the entertainment industry and other sectors. Their benefits include improving the management of electrical safety, the reduction of noise levels, the development of safety in communications and reducing trip hazards as well as providing an essential tool for the security orientated services. Wireless equipment and the spectrum it operates in are now more crucial to the British entertainment industry than they have ever been.

BEIRG supports the move to develop a long term harmonised plan for PMSE spectrum access across Europe. Such a plan is long overdue. Further delays in providing this, combined with the upheaval in current PMSE spectrum access, are leading to even greater uncertainty in the PMSE sector as professionals put off buying new equipment and making long term business decisions.

¹[UK Government Department for Culture, Olympics, Media and Sport](#)

However, the harmonisation of the 821-832 MHz and 1785-1805 MHz should not be considered a solution to the serious spectrum deficit affecting PMSE. These bands offer an extremely limited quantity and quality of spectrum, and must not be viewed as an adequate replacement for the 800MHz, and potentially 700MHz, bands from which PMSE access has been rescinded.

At each performance in London's West End there are around 1000 pieces of wireless PMSE equipment in use across all the venues. At the same time news crews and other content producers are also operating in this area, requiring further spectrum access. General daily production requirements require a minimum of 96 MHz with demand growing to in excess of 300 MHz for large and special events. These two bands will not provide an adequate replacement from these kinds of services.

Furthermore, there is likely to be a high level of interference on any PMSE operations in 821-832 MHz and 1785-1805 MHz from LTE services in adjacent bands. If these bands are fit for any PMSE use, they will not be fit for the high-quality professional services which are required for content and high level entertainment production.

Harmonised access to 821-832 MHz and 1785-1805 MHz is a welcome addition to the PMSE spectrum allocation. However, it must be regarded as an additional consumer band, and not a suitable allocation for professional services, nor as an adequate replacement for the 800 MHz, or 700M MHz, band.