



British Entertainment Industry Radio Group (BEIRG) response to Draft RSPG Opinion Strategy on the future use of the frequency band 470-695 MHz beyond 2030 in the EU August 2023

Introduction

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. Venues and productions that depend on radio spectrum include TV, film, sport, theatre, churches, schools, live music (including music festivals), newsgathering, political and corporate events, and many others. BEIRG campaigns for the maintenance of Programme Making and Special Events access to sufficient quantity of interference-free spectrum for use by wireless production tools such as wireless microphones and wireless in-ear monitor (IEM) systems.

As well as being vital in producing live content, wireless audio PMSE technologies play a key 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 in which it operates are now crucial to the British entertainment industry.

BEIRG is a member of the Association of Professional Wireless Production Technologies (APWPT), which promotes on an international level the efficient and demand-driven provision and use of production frequencies for professional event productions, as well as safeguarding such production frequencies for the users on the long run.

BEIRG has worked successfully with the UK regulator Ofcom in recent years as spectrum allocations for PMSE have changed. We have been encouraged by the development of a strong working relationship in which Ofcom have listened to the concerns of the PMSE community and in many cases acted upon them. As a key stakeholder and contributor to the thriving Creative Industries sector, BEIRG believes it is essential that role of the PMSE community is recognised by all decision-makers.

Against the backdrop of uncertainty around changes in DTT allocation, combined with the potential consequences of Agenda Item 1.5 for WRC-23, it is imperative that our sector has access to sufficient dedicated sub 1 GHz spectrum, with appropriate security of tenure, to allow it to continue to create and deliver world-class content with a global reach. In recognising the increased demand of spectrum for PMSE, we hope that the RSPG will produce proposals that ensure long-term security of tenure and the environment to allow PMSE to flourish.

Both Shure and Sennheiser are members of BEIRG and we support the comments in their submissions about harmonisation, the importance of the 470 to 694 band to audio PMSE and the need for certainty for the sector.

PMSE and increasing demand

PMSE is no longer just about theatre shows and large scale events but about an entire ecosystem that effects everyone in some shape or form. We have faced 2 significant moves in the UK in the past 10 years, resulting in a reduction of nearly 50% of spectrum available to us.

The impact of these changes, while mitigated by the UK Government funding scheme, were significant to many in the industry. Further reduction in spectrum access will have a critical effect on the industry's ability to deliver daily events of all sizes and scales, and it is also important to add that while financial support packages help, these only work in conjunction with ensuring sufficient existing spectrum is maintained or new technically viable spectrum is made available to the PMSE sector.

The growing pressure around the world to concede more of the precious UHF band, on which we rely so heavily, to the mobile sector is highlighted by Agenda Item 1.5 of the World Radio Conference (WRC) 2023. Having had our spectrum allocation cut twice in a relatively short period of time, we are cognisant of the fact that decisions made this year could have a profound impact on PMSE and its ability to produce the content that is so important to all of us. These include the recent coronation of King Charles III and Eurovision (with very tight change-overs enabled by DECT technology) where we all saw the role that our members played in delivering a flawless broadcast of numerous events – and without PMSE these simply would not have happened.

The digital revolution, driven by technology, new delivery platforms such as Netflix, Disney+, Amazon etc and burgeoning consumer demand for data through live screening, streaming and IPTV, is clearly a significant force. However, there is a symbiosis here that is mostly missed in that this drives further demand for content creation – and therefore PMSE activity.

Consequently, it is vital that regulators recognise this and prioritise policies to maintain and protect accessible spectrum for PMSE use in the long term.

PMSE and Spectrum Sharing

BEIRG is aware of the need for greater spectrum sharing in order to meet increasing demand. While PMSE is a significant user of spectrum, most of this spectrum is already shared with at least one other incumbent and is therefore recognisably a very efficient user of spectrum.

However, as plans for spectrum sharing are progressed, BEIRG has some significant concerns – not all spectrum sharing scenarios effectively meet the needs of the sharers, and it is essential that that is at the forefront of decisions over spectrum allocations. The quality of service needed for the broad range of applications, technologies, and activities that PMSE supports, from large scale sporting, cultural and State events to services of worship and events at schools and village halls need to be maintained as a way is devised to meet the increasing demand for greater spectrum access for the mobile sector this must always be a factor in the policy and decision-making processes.

PMSE has adapted to become increasingly spectrally efficient, with manufacturers making significant steps in this area. However, BEIRG would like to stress this level of technological advance should not always be relied on: squeezing the sector any more could seriously damage its ability to provide high quality content. PMSE has access to nearly 50% less spectrum than it did 10 years ago, and has had to adapt to continue to provide a high level of service to the ever-growing creative industries sector.

Access to harmonised spectrum

One of the key benefits of the 470 to 694 MHz band is the universal availability of the band across CEPT and many countries globally. This brings significant benefits to the PMSE sector, including access to equipment from a broad range of suppliers and the ability for events to tour through different countries.

The UK Creative Industries Sector Vision – an example of our growing sector

As the UK Prime Minister stated in his forward to The Creative Industries Sector Vision, published earlier this year: *“Culture is something we all share. All of us have favourite songs that soundtrack the most meaningful moments in our lives. All of us remember childhood stories we want to read to our own children. All of us have a TV show we’re binge watching and turn to films, games, or the theatre to transport us to a different world.*

Many of our favourite things are made here, in the UK. And that’s true for people the world over. The creative industries are a true British success story, from global music stars like Adele and Ed Sheeran to world-class cultural institutions like the National Theatre. These industries have a special place in our national life and make a unique contribution to how we feel about ourselves as a country. You can see it in events like Eurovision, shows like Life of Pi, or games like Football Manager: so often the creative industries help to strengthen the bonds between communities.

As well as projecting our values on the world stage, the creative industries drive our economy at home. The contribution they make has often been underappreciated. These industries generate £108 billion a year. Employ over 2.3 million people in every corner of the country. And there is a real sense of energy in the sector, which has grown at more than 1.5 times the rate of the wider economy over the past decade.”¹

These words are reassuring to hear from the UK Government, but it is likely that they are relevant and applicable to EU as well. It is vital that Government, Ofcom and all others involved in spectrum policy making recognise that the increased growth rates in revenue and employment along with many key elements of the creative industry sector are only made possible by the PMSE sector, and that in turn PMSE is dependent on secure, long-term spectrum access and policy.

Bold Government aims to grow the sector by £50m by 2030 will be significantly impeded if PMSE’s access to spectrum is not prioritised, and that appropriate policy formed to support this critical area of development.

Conclusion

PMSE is an essential tool in all live events as well as TV, film, sport and corporate events. Without certainty over spectrum allocation beyond 2030, PMSE will be further challenged to provide high quality content in ever-decreasing spectrum and there will come a time when this is simply impossible to accomplish. The output enabled by PMSE runs far beyond the manufacturers, rental companies and supply chain businesses – and the consequences of ignoring this sector damages the whole creative industries, affects the daily lives of millions and in turn significantly impacts the economy.

For further information please contact Anna Wolffe, BEIRG Steering Committee on 020 3642 2754 or hello@beirg.org

¹ [Creative industries sector vision: a joint plan to drive growth, build talent and develop skills - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612217/creative-industries-sector-vision-a-joint-plan-to-drive-growth-build-talent-and-develop-skills.pdf)