

Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

Ofcom Draft Annual Plan 2016/2017

Date: February 2016

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Executive Summary

- BEIRG welcomes Ofcom's closer engagement with the PMSE industry
- Completing the work on alternative spectrum for audio PMSE should be one of Ofcom's top priorities in its Annual Plan for 2016/17
- As part of its Annual Plan, Ofcom should set aside additional resources to monitor the rollout of White Space Devices (WSD) and any interference caused
- BEIRG urges Ofcom to reconsider its decision not to test the effect of multiple WSDs when operating in close proximity, as BEIRG believes that such operations will increase intermodulation and hence raise interference levels

Introduction

BEIRG welcomes Ofcom's markedly increased engagement with the audio PMSE industry over recent years. In particular, we would like to thank Ofcom for the work undertaken with regards to finding alternative spectrum for audio PMSE. While there is still much work to do, we look forward to working with Ofcom with the same spirit of cooperation to find a successful solution to audio PMSE's future spectrum deficit.

In 2016/17 Ofcom must continue its engagement with the audio PMSE sector, an industry which provides the foundations for the UK's world leading creative industries. Our two priorities for this period are reaching a suitable arrangement for alternative spectrum and monitoring the rollout of white space devices.

Reallocation of the 700MHz frequency band and the allocation of alternative spectrum

We support Ofcom's general commitment to provide a statement on the timing and details of the clearance of the 700MHz band. Given that both the bands identified as suitable for sharing with PMSE represent a UK only solution, a firm commitment to a sustainable alternative band(s) for audio PMSE is essential to encourage manufacturers to begin the process of researching and developing new equipment for the band(s). With the clearance of the 700MHz due to be complete by 2020 and no clear solution yet in place for PMSE, the allocation of viable alternative spectrum should be considered one of Ofcom's top priorities.

It is important to recognise that the viability of the proposed alternative band(s) is heavily dependent on information that is not yet fully available. BEIRG therefore urges Ofcom to make as much preliminary information available as early as possible, in addition to the full statement, to support the deliberations on alternative spectrum. In particular, indicative white space availability and quality in the sub-700MHz will help predict the future volume of use in the existing spectrum and proposed alternative spectrum. The DTT transmitter bands for each location will also have an impact on the availability and quality of sub-700MHz spectrum, so it is important that BEIRG is kept up to date with specific details about the repackaging of DTT, including the work on DTT relays. This information is important both to build a business case for the new band and to show that the alternative spectrum is sufficient to meet present and future demand for audio PMSE services.

Since the new band is a UK only solution, the market viability of the new spectrum is contingent upon the attractiveness of the new band to manufacturers and consumers. This will rely heavily upon the funding package delivered by the Government. Ofcom should continue to work with the Department for Culture, Media and Sport to stress the importance of an early commitment to suitable funding for audio PMSE users. Due to the amount of time and money involved in research and development of new equipment, a scheme that incentivises early uptake of equipment in the new spectrum is crucial to build a viable business case.

The suitability of the proposed alternative spectrum for PMSE will be determined by its ability to address the shortfall of spectrum following the 700MHz clearance and the repackaging of DTT while supporting a viable market for manufacturers. Ofcom should therefore prioritise the gathering and release of information that fills this information gap.

White Space Devices

Despite BEIRG's documented reservations about the White Space Device project, both licence-exempt and licensed manually configured WSDs have been approved for use in UHF band (470-694 MHz). Ofcom should

now consider it a priority to monitor the rollout of WSDs to ensure that they work exactly as prescribed by Ofcom's regulations.

WSDs are a new and largely untested technology. It is essential that Ofcom closely scrutinises the operation and impact of WSD technology early on to give the policy the best chance of working sustainably in the long-term. To this end, BEIRG urges Ofcom to set aside greater resources for monitoring the rollout of WSDs. As an industry, PMSE routinely under-reports instances of interference because of the time pressures associated with event production and live touring, for example. If interference caused by WSDs goes unchecked now, the problem could become unmanageable as WSD usage proliferates.

To help the PMSE industry report interference, Ofcom should set out what information it intends to make available on the location of white space networks as PMSE users will be more likely to report interference if they know that there are WSDs operating in the vicinity. It will be beneficial to all parties if PMSE users are incentivised to accurately report interference as this information can support Ofcom's own monitoring efforts and shape the direction of Ofcom's WSD policy.

We also urge Ofcom to revisit its decision not to test the effect of multiple WSDs in operating in close proximity. BEIRG believes that such operations will increase the risk of intermodulation and hence potentially create more interference into audio PMSE.

Conclusion

BEIRG welcomes Ofcom's markedly increased engagement with the PMSE community, and specifically thanks Ofcom for the work undertaken so far on the alternative spectrum for PMSE. Diminished spectrum access will have a seriously damaging effect on the creative industries and it is essential that this situation is avoided as a priority. In addition to providing alternative spectrum, it is important to protect the quality of remaining spectrum. With this in mind, Ofcom should be diligent in monitoring the rollout of White Space Devices.

British Entertainment Industry Radio Group

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, newsgathering, political and corporate events, and many others. BEIRG campaigns for the maintenance of 'Programme Making and Special Events' (PMSE) 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 it operates in are now crucial to the British entertainment industry.

BEIRG is a member of the Association of Professional Wireless Production Technologies (APWPT)¹, 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.

¹ <http://www.apwpt.org/>