



FEBRUARY 2021

BEIRG CONSULTATION RESPONSE

'SPECTRUM MANAGEMENT STRATEGY FOR THE 2020s'

For further information on BEIRG please contact:

**Anna Wolffe**

**Managing Director, Ranelagh Political Communications**

T: 020 3642 2754

M: 07960 793315 [www.ranelaghuk.com](http://www.ranelaghuk.com)

## Consultation response form

Please complete this form in full and return to [spectrum.management.strategy@ofcom.org.uk](mailto:spectrum.management.strategy@ofcom.org.uk).

<b>Consultation title</b>	Supporting the UK's wireless future – Our spectrum management strategy for the 2020s
<b>Full name</b>	Anna Wolffe
<b>Contact phone number</b>	07960 793315
<b>Representing (delete as appropriate)</b>	Self / <u>Organisation</u>
<b>Organisation name</b>	BEIRG
<b>Email address</b>	anna.wolffe@ranelaghuk.com

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	<u>Nothing</u> / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	<u>None</u> / Whole response / Part of the response (you will need to indicate below which question responses are confidential)
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes / No

## Your response

Question	Your response
<p data-bbox="164 629 549 678">Question 1: Do you have comments on the overall approach to the review?</p>	<p data-bbox="603 629 788 656">Confidential? – Y / <u>N</u></p> <p data-bbox="603 680 1023 913">In 2.1 of the consultation Ofcom notes: “Use of the radio spectrum benefits every person and organisation in the country. It helps deliver our news, connect us to friends and family, automate factories and support public services. It’s used for every type of wireless communication, from TV and radio to the very latest smartphones, and for monitoring our climate and natural environment.”</p> <p data-bbox="603 943 959 969">In reply to this BEIRG would like to note:</p> <p data-bbox="603 999 1018 1330">On a daily basis PMSE is responsible for the production of content that has received world-wide acclaim and continues to attract a global audience. A vast array of organisations are reliant on spectrum for the production of content for Performing Arts, Broadcasting, News Gathering, Independent Film and TV Production, Corporate Events, Concerts, Night Venues and Sports Events. In addition, other sectors that utilise the current UHF spectrum include the National Health Service, Education, Local Government, Political Programming and Conferencing.</p> <p data-bbox="603 1359 1018 1592">In addition, these technologies 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.</p> <p data-bbox="603 1621 1002 1747">Wireless equipment and the spectrum it operates in are crucial to the British Entertainment Industry, but they are also essential to the very fabric of everyday life in the UK. Not forgetting the fact that it is also</p>

responsible for delivering billions in revenue every year to HM Treasury.

As we have all have witnessed over the past 12 months, all parts of this important industry have been sorely missed, and the inability to go to concerts, theatre and major events has been clearly documented to have had a major impact on the lives of the entire UK population. More than ever, we can now clearly understand the importance to the well-being of the country of our creative industries.

Moving forward, BEIRG believes, as it always has done, that it is essential to find long term solutions that enables all of these key elements, which are so vitally important to the well-being of the entire population, to continue to function and thrive. In finding these solutions, it is absolutely crucial that, and should therefore in turn be an essential part of, Ofcom's planning for spectrum allocation in the UK should be aligned with partners in the European Union and the rest of the world.

Taking a long-term view, with an industry so valuable to the UK population, will in turn allow manufacturers the security of tenure to allow their continued investments into new and more spectrally efficient technologies, something which they have demonstrated so well their ability to do since the start of the changes brought about by the Digital Dividend Review (DDR).

BEIRG welcomes the consultation on Spectrum planning, but it is essential that any decisions which are made are in conjunction with sector specific reviews that have and are taking place. BEIRG recognises that Ofcom has identified PMSE as an important sector that justifies its own review alongside other key sectors listed in section 5.4. It is vital that the outputs of sector reviews are cross-referenced with all other sectors. One observation is that in the past, Ofcom have not always looked holistically at spectrum management and we therefore seek assurances that each review will be considered against the wider needs and demands of other sectors under your jurisdiction. For example, to

	consider how the needs of fixed links or aeronautical impact on PMSE.
<p><b>Question 2: Have we captured the major trends that are likely to impact spectrum management over the next ten years?</b></p>	<p>Confidential? – Y / <u>N</u></p> <p>In light of the widely debated future of DTT, BEIRG questions whether the timeframe of the consultation adequately reflects the potential future changes in spectrum usage. As the results of this consultation will most likely govern spectrum use and needs into the 2030s, there should be greater consideration given to expected demand for spectrum usage beyond this date.</p> <p>It is important that regulators and governments do not accept without question all of the promises of the International Mobile Telecommunications (IMT) lobby. Many functions of dedicated PMSE technology cannot be replaced by IMT, whether 4G, 5G or whatever. There are some use cases where it is conceivable that IMT could provide services similar to current PMSE equipment, but in the majority of live performance activities there will always be requirements for dedicated technology under the control of the production. There are even applications in live performance where it is still impossible to replace analogue transmission since no digital system has zero latency and even a single millisecond of transmission delay is unacceptable, in some cases with health and safety implications. Decisions on the suitability of a particular technology for PMSE purposes should be made in conjunction with the PMSE community.</p>
<p><b>Question 3: Could any of the future technologies we have identified in Annex 6, or any others, have disruptive implications for how spectrum is managed in the future? When might those implications emerge?</b></p>	<p>Confidential? – Y / <u>N</u></p> <p>Many of the future technologies that Ofcom have identified suggest spectrum sharing as a major factor in this future strategy. We would like to stress the importance of understanding and giving sufficient consideration of the needs of PMSE in this context. PMSE have always been ‘good sharers’ having spent 30+ years sharing with terrestrial television, and more recently through your own studies and engagement with the PMSE sector, with DME</p>

and other Aeronautical Communications and Navigation systems . We can co-exist with current Digital Terrestrial Television (DTT) networks because of the different demands of the two services; (i.e.) high power, high coverage/range (DTT) v low power, low coverage/range (PMSE). We do nonetheless need to be mindful and cautious of the impact on PMSE of new sharing technologies being developed and implemented in the same spectrum as current PMSE usage. As was proven in the context of WSD consultations and the extensive associated works by Ofcom and industry<sup>1</sup> some years ago (Jan & Dec 2013), the protection criteria required by PMSE equipment was found to be prohibitive to the deployment of white space devices within spectrum allocated to PMSE. The work referred to above was carried out using analogue systems in use throughout the industry at that time. In 2016, further tests were carried out<sup>2</sup> to establish sharing potential with Aeronautical DME systems and this work looked at the protection criteria of some of the more recent digital systems that are in use today

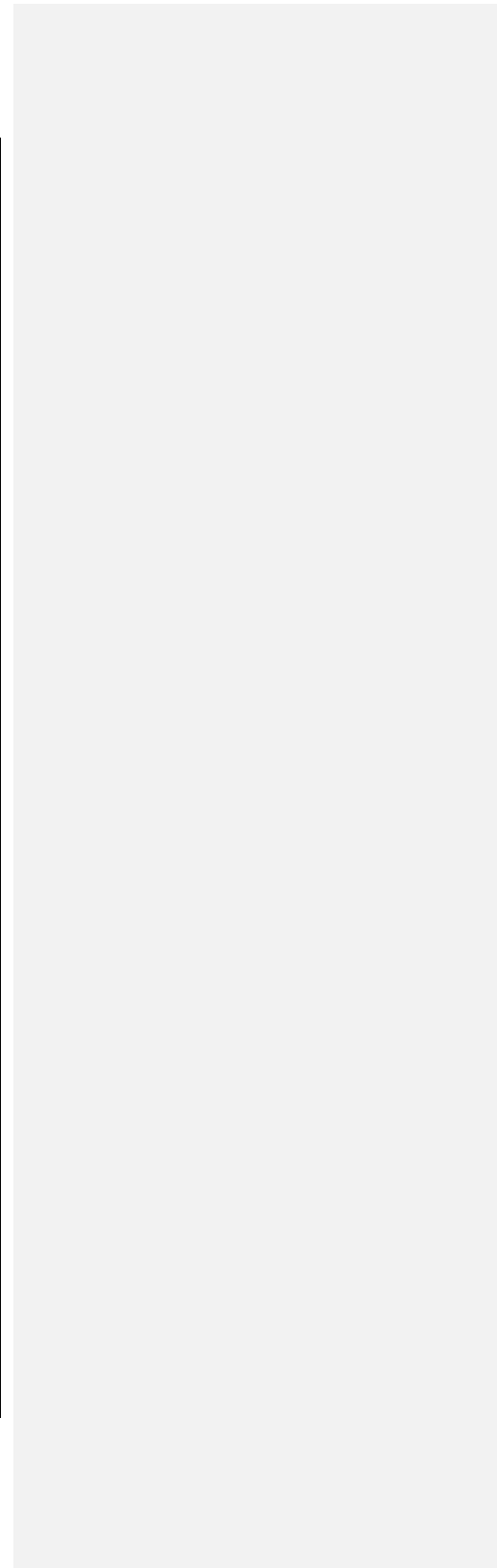
When Ofcom next considers the viability of technologies for sharing with PMSE, it is essential that the PMSE sector is fully protected. Whilst PMSE supports Ofcom's aim to share spectrum more widely and, as proven, we are already a good sharer, it is likely that we can only share with some technologies. This perspective is based on current PMSE technologies. Over the course of the DDR, DSO and both 800 and 700 MHz clearance programmes, PMSE have embraced technological developments, become even more spectrally efficient and have demonstrated an ability to adapt to the changing spectrum landscape. BEIRG would support and encourage Government investment in R&D in the sector to promote development of further new technologies for PMSE.

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<sup>1</sup> [Consultation \(ofcom.org.uk\); Test Report for the Coexistence of PMSE with Aeronautical Services \(ofcom.org.uk\); Consultation \(ofcom.org.uk\)](#)

<sup>2</sup> [Statement \(ofcom.org.uk\) \(page150\); Consultation \(ofcom.org.uk\)](#)

	<p>For the same reasons that we have discussed on many occasions, the PMSE sector is not in a position to re-equip on a regular basis, and this is only possible with financial Government support.</p> <p>BEIRG would also like to request that Ofcom ensure that the MNO's are required to adapt and demonstrate improved spectrum sharing capabilities. The current coverage plans do not adequately demonstrate this, due to insufficient collaboration between networks, but in order to uphold the underlying principle of efficient spectrum management we feel Ofcom has a duty to ensure this is implemented before further spectrum allocations are made to the MNOs.</p>
<p><b>Question 4: Do you agree that there is likely to be greater demand for local access to spectrum in the future? Do you agree with our proposal to consider further options for localised spectrum access when authorising new access to spectrum?</b></p>	<p>Confidential? – Y / <u>N</u></p> <p>The PMSE community already has significant demand for local spectrum, by virtue of the fact that we access spectrum on a geographically interleaved basis in the UHF bands. We do not have sufficient information to comment on future demand for access to spectrum on a local or national basis in regard to other sectors.</p> <p>However, as mentioned above, operating in interleaved spectrum has demonstrated to PMSE and Ofcom the value of co-ordinated spectrum assignments. For the significant proportion of the PMSE sector that operates in the live environment, it is of paramount importance that we are able to operate with zero interference. The licensed and co-ordinated model that exists under the current arrangements offers significant security and protection to our sector. The disparate and specialist nature of the sector means that many businesses and individuals are experts in their field and their reputation relies on a clean, interference-free production.</p>
<p><b>Question 5: Do you agree with the actual and perceived barriers identified for innovation in new wireless technologies, and our proposed ways of tackling those?</b></p>	<p>Confidential? – Y / N</p>



<p><b>Question 6: Do you agree with Ofcom's proposals to improve our outreach and reporting activities, and spectrum information tools?</b></p> <ul style="list-style-type: none"> <li>• Are there additional ways that Ofcom could better engage with existing and future users and providers of wireless communications?</li> <li>• Please explain any specific areas where you believe more or better provision of information could provide value to stakeholders</li> </ul>	<p>Confidential? – Y / <u>N</u></p> <p><b>Responsible spectrum usage</b>  In a world of increased spectrum efficiency, individual frequency allocations become more narrowly spaced. Therefore the impact of one momentary incident of interference becomes significantly greater. In order to raise awareness of this, BEIRG are looking to publish a radio code of conduct for users that will detail safe and responsible working practices. This is intended to increase awareness of the consequences of misuse as well as intentional and unintentional unlicensed usage. BEIRG feels that Ofcom would be well placed to support this industry initiative.</p>
<p><b>Question 7: Do you agree that it is important to make more spectrum available for innovation before its long-term use is certain? Do you have any comments about our proposed approach to doing this?</b></p>	<p>Confidential? – Y / <u>N</u></p> <p>It is important to have spectrum available for innovation and it is important to recognise the need for new technologies to be considered for a trial period to prove the technical viability alongside potential sharers, as well as proving sufficient demand for that technology before making permanent licences and allocations.</p>
<p><b>Question 8: Do you agree that it is important to encourage spectrum users to be 'good neighbours' to ensure more efficient use of the spectrum? Do you agree with our proposals to:</b></p> <ol style="list-style-type: none"> <li>increase realism in coexistence analysis at a national and international level?</li> <li>encourage spectrum users to be more resilient to interference?</li> <li>ensure an efficient balance between the level of interference protection given to one service and the flexibility for others to transmit?</li> </ol> <p><b>Do you have any comments on which of these will be the most important?</b></p>	<p>Confidential? – Y / <u>N</u></p> <p>Yes</p> <p>We refer you to our response to Q3</p> <p>Regarding c) we fundamentally do not agree with any measures that reduce the interference protections that licensed co-ordinated use offers as described previously in our answer to Q4.</p> <p>Live production has to maintain interference free performance levels, and there is no likely relaxation on this point which is different to, for example, the general public's broad acceptance of a dropped phone signal for a brief moment.</p> <p>This is the most important of the proposals.</p>

**Commented [Anna Wolf1]:** How much is allocated for innovation?



**Question 9: Are there any other issues or potential future challenges that should be considered as part of this strategy?**

Confidential? – Y / N

**Security of tenure**

The clearance of both the 800MHz and 700MHz bands has already caused significant disruption to the PMSE sector and despite Government financial support, has negatively impacted the industry over the last 10 years. The industry practices have become even more spectrally efficient and technological developments have helped that too BUT ensuring the sector has reasonable, protected access to sufficient quantity and quality of spectrum is of paramount importance, not only to the affected companies but to the entertainment industry and UK economy as a whole. Therefore, the PMSE sector is looking for some security of tenure and reassurance that this is not to be a 5-7 yearly cycle. We are concerned that there will be another clearance programme, either of 500MHz or of the wider UHF band as more programme delivery becomes IP or satellite based. The upheaval for those who provide content and support our creative industries cannot be over-stated and another move would have a highly damaging impact on the PMSE community.

**Spectrum Fees**

BEIRG recognises the value of licensed spectrum but it should be recognised that they are a necessary tool for the job, not a business or opportunity cost.

There is no direct correlation between the amount of spectrum available/ the amount used per production/ the use of equipment and the economic value that the programme or event generates. Spectrum adds value to the economy because of what it allows but should not be priced in such a way.

**Question 10: Do you agree that continued use of our existing spectrum management tools (as set out in sections 4-7) will be relevant and important for promoting our objectives in the future, in light of future trends?**

Confidential? – Y / N

**Question 11: Is there anything else we should be considering doing, or doing differently, to promote our objectives?**

Confidential? – Y / N

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