

Department of Culture, Media and Sport Consultation

British Entertainment Industry Radio Group (BEIRG)

Enabling UK Growth – Releasing public spectrum
Making 500 MHz of spectrum available by 2020

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Introduction

The British Entertainment Industry Radio Group (BEIRG) is an independent, not-for-profit organisation which represents the interests of members of the Programme Making and Special Events (PMSE) sector who use radio spectrum. The PMSE sector is a diverse and diffuse community of content producers, manufacturers, rental organisations and freelance engineers. The sector is responsible for both the delivery and content production of live and recorded entertainment. To produce and deliver live content, the sector relies upon wireless equipment such as wireless microphones, in-ear monitor systems, talk back systems and instrument systems. Due to their high level of audio quality, convenience and ease of use, wireless microphones are deployed across all areas of event production.

On a daily basis the sector is responsible for the production of content that attracts a global audience. Organisations reliant on PMSE include; broadcasting, concerts, independent film and TV production, performing arts, corporate and sporting events. These wireless technologies are used extensively in the production of entertainment content, meaning the PMSE sector plays a vital role in the on-going success of the £15bn pa British entertainment industry.

PMSE equipment operates within the frequency bands reserved UK-wide for analogue television broadcasts, alongside channel 69, the dedicated UK-wide channel for PMSE users. This operating environment is currently being altered as a result of the digital switchover process (DSO).

PMSE users are currently being relocated from channel 69 to channel 38. Although Ofcom has agreed to pay 55% of the new cost of the new PMSE equipment required to function in channel 38, the forced relocation has still come at a considerable cost to the industry, both financially and operationally. In particular, the DSO is significantly reducing the amount of spectrum PMSE users have access to, and as BEIRG has continually emphasised throughout the process, the PMSE industry does not possess the organisational or financial capabilities to compete at auction to purchase newly released spectrum. Given the severe disruption that the PMSE industry is currently facing, and given the fact that PMSE is responsible for delivering cultural, social and economic benefits to British consumers and citizens, BEIRG believes that PMSE users should be considered when consulting on releases of public spectrum.

Response

1. This is the British Entertainment Industry Radio Group (BEIRG) response to the Department for Culture, Media and Sport Consultation on '*Enabling UK growth – Releasing public spectrum*'. This response focuses on the importance of considering PMSE use of spectrum when releasing public spectrum.
2. Throughout the DCMS consultation there is not only a failure to mention PMSE users as a potential recipient of any newly released public sector spectrum, but also a complete failure to mention the PMSE industry as key users of radio spectrum.
3. Access to sufficient quantity of interference-free spectrum is essential for PMSE users. PMSE equipment is at the forefront of the production chain, consequently any interference affects the whole performance or event and damages downstream revenue. At present the PMSE sector relies on the interleaved spectrum between existing broadcast channels to enable the use of its equipment, alongside channel 69, which is dedicated for PMSE use. However from 2012 this operating environment is set to change as a result of the Digital Switchover. After 2012 PMSE users will be prevented from using channel 69, and instead will be operating in channel 38. The industry has suffered great disruption as a result of the clearance of the 800 MHz band.

This disruption has not only been financial; the clearance of the 800MHz band of broadcast services has led to a significant reduction in the amount of the interleaved spectrum which PMSE users have access to.

4. Despite increasing restrictions on the spectrum available to PMSE there is an increasing demand for PMSE derived content. Live music events, theatre productions, live television broadcasts and live sports events in particular, are increasing the quality of their productions. It is predicted that the London 2012 Olympics will account for the largest single use of spectrum in the UK. Post-DSO an event of this size would face severe restrictions on its content production as result of the significant reduction in PMSE access to spectrum. If PMSE access to interleaved spectrum continually decreases, and white space technologies are introduced to the remaining interleaved space, the PMSE industry will be unable to meet consumer demand. This risks not only the loss of Britain's role as a world-leader in the production of entertainment content, but also a significant flight of income and investment from an industry which contributes heavily to the British economy, attracts visitors from all round the world, and employs thousands of people. BEIRG believes that any publically released spectrum which is suitable for PMSE use should thus be considered for PMSE use.
5. BEIRG is also concerned about the Department's suggested release of the 406.1-470MHz band, which is currently used by business radio. Business radio plays a vital role in the PMSE industry. It is used by PMSE professionals in theatres and on sets for communication between colleagues. Without this technology, and the required access to spectrum, the PMSE industry would not only face many logistical communications challenges, but there would also be health and safety implications. Backstage environments can prove to be dangerous working environments were effective communication between PMSE professionals is essential. The removal of spectrum access for business radio would lessen PMSE professionals to communicate effectively onsite.
6. If the Department intends to relocate business radio to another band of spectrum it must be conscious of the financial and logistical burden that this would produce, and that the Government would have an obligation towards resolving. The PMSE industry has suffered a great deal of disruption as part of its eviction from channel 69 to channel 38. DCMS should take note of these costs, and consider them fully before proposing any similar spectrum relocation for business radio.

Conclusion

7. BEIRG believes that if public spectrum is released which could be used for PMSE operations, allocating this spectrum for PMSE use must be considered in light of the diminution of spectrum accessible to the PMSE industry. The PMSE industry is facing growing pressures on its ability to produce content, due to:
 - a) PMSE users access to spectrum is currently being diminished, and faces further threats on the horizon;
 - b) That the PMSE industry faces ever-increasing demand for its content by citizens and consumers in the UK, and worldwide.
8. BEIRG has also stressed that DCMS should carefully consider both the considerable importance of business radio to the PMSE industry, and any problems or costs which could be incurred through relocation, before it considers releasing the spectrum which business radio currently operates in.