

Department for Digital, Culture, Media and Sport Call for Evidence

Wireless Infrastructure Strategy

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**Response from the British Entertainment Industry Radio Group
(BEIRG)**

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Introduction

- BEIRG is glad to have the opportunity to comment on these proposals and looks forward to continuing to work with DCMS and Ofcom to ensure that as these plans are taken forward there are no negative consequences for the Programme Making and Special Events (PMSE) sector.
- It is essential that, when considering plans for increased connectivity for the UK, a holistic view is taken for those who might be inadvertently impacted. The Programme Making and Special Events Sector is one such group and will seek to engage with policy makers to ensure that moves towards 5G rollout and faster speeds do not adversely affect PMSE's ability to produce high quality content.

- As demand for content increases, the role that the PMSE community plays in enabling this growth is becoming ever more important
- We support the submissions made by our partners in the creative industries, and hope all our responses will be considered together.

Programme Making and Special Events Sector

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. Wireless equipment and the spectrum in which it operates are crucial to the British Entertainment and Events Industry, and they are also essential to the very fabric of everyday life in the UK.

According to the BVEP UK Events Report¹ published earlier this year, the overall events and entertainment industry generates in excess of £70bn a year for the UK economy. The PMSE sector plays a significant part in the delivery of all these events – for example arts and cultural, music festivals and events, and sporting events contribute £38.8bn annually. As we have all witnessed over the past 18 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.

Productions values, audio capture, location-recording and reality TV productions have developed exponentially, in terms of volume, scope and scale of production. The industry spend was £3.6Bn in 2019, showing a 16% increase on 2018 - revenue represents 20% of the whole of the creative sector. Globally, Netflix anticipated \$17bn spend on Content Creation in 2020, rising to \$26Bn in 2026 and Disney allocated \$500m. In the music sector, over 30million fans attended gigs and festivals in 2019, contributing £4.5bn to the UK economy alone.

Impact of COVID

During the pandemic we have seen a necessary transition as traditional ways of viewing arts and culture was prohibited. Our flexible sector has found new ways of reaching not only the same audience as before, but a more diverse, wider global audience as well.

Facebook and Instagram report that 800 million people per day are watching live streams. This trend is projected to continue with 74% of live stream viewers saying they would continue to watch live streams even now live concerts have returned, and 70% would be willing to pay for live streaming.

¹ [BVEP - Business Visits and Events Partnership - BVEP launches report focused on £70bn events industry](#)

Theatre sales throughout the UK reached 34 million tickets in 2018, up 80% from 18 million in 2014. In addition to the traditional live audiences, both recorded & live streams to cinemas, globally opened a whole new audience. In the face of a pandemic, this has grown to include the online, on demand, live-streaming platforms – a new engagement that is here to stay. For example, The National Theatre (NT) at Home scheme was one of the biggest virtual successes of lockdown. It screened 17 productions and garnered more than 15m views from audiences in more than 170 countries.

As demand for content grows, so does the demand for PMSE. New content feeds these delivery platforms in a volume not previously seen. It is vital that DCMS and Ofcom recognise this inextricable link between PMSE creating the content and the wider digital world delivering that same content to consumers, across a vastly expanded range of platforms. Putting it simply, without content capture and creation, the live, virtual and digital audience has nothing to consume. Moving forward, BEIRG believes, as it always has done, that it is essential to find long term solutions that enable 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 the sector be considered as a key constituent when planning for spectrum allocation and considering the ways in which industry can become more spectrally efficient. Taking a long-term view with an industry so valuable to the UK population, will in turn allow manufacturers the security of tenure to continue their investments into new and more spectrally efficient technologies. They have already demonstrated considerable ability to do this since the start of the changes brought about by the Digital Dividend Review (DDR).

PMSE and Spectrum Sharing

Many of the future technologies that have been identified suggest spectrum sharing as a major factor in planning for the future – underlined by Ofcom’s recently published spectrum management strategy for the 2020s. 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 40+ years sharing with terrestrial television, and more recently through Ofcom’s own studies and engagement with the PMSE sector, with DME and other Aeronautical Communications and Navigation system. 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 as the Department moves towards increased spectral efficiency in the same spectrum as current PMSE usage.

As was proven in the context of White Space Devices consultations and the extensive associated works by Ofcom and industry 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 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. Whilst PMSE supports the 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. In the context of sharing or utilising 5G technologies, BEIRG believes there is a risk that Governments and regulators believe 5G is the solution to everything. Although BEIRG is aware of the many potential applications and benefits that 5G will bring in terms of creativity and connectivity, we remain cautious about its ability to deliver real world solutions for PMSE applications. We welcome that this is being explored and watched by many in the technology sector, including manufacturers in our sector, however the initial research suggests that it is unlikely to provide sufficient technical performance, in terms of spectral efficiency, latency, and service reliability (or in more commercial terms financial viability), to the PMSE sector.

Summary

To conclude, we have already seen PMSE spectrum availability in the UK shrink by nearly 50% in the last decade, and with changing delivery methods and viewing patterns, the reduction in terrestrial TV networks leaves PMSE exposed.

Global Governments and regulators must recognise the collective need for a long-term, global solution that allows PMSE to thrive and in turn feed the digital revolution that mobile enables.

Globally harmonised spectrum, dedicated to content creation, is a critical requirement for us all.

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 (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)², 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.

²<http://www.apwpt.org/>