

## Ofcom Consultation

### British Entertainment Industry Radio Group (BEIRG)

#### *Spectrum for audio PMSE Proposed use of the 694 to 703 MHz band*

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### Answers to Questions

***Q1: Do you have any comments on our proposal to allow audio PMSE services to operate in the guard band from 694 to 703 MHz, and that this would be a benefit to PMSE users?***

It is imperative that Ofcom decouples the 694 – 703 MHz guard band from the assessment of funding eligibility under Ofcom's PMSE support scheme. Most importantly, there is no guarantee that the guard band spectrum will be useable and it would be unfair to set funding criteria based on unknown quality spectrum.

Additionally, including the guard band in the calculation of funding eligibility as currently proposed would render a large amount of equipment ineligible which would previously have received funding. For example, the popular N-GB range of Sennheiser wireless microphones (606-790 MHz) currently have 52.2% of their tuning range in the 700 MHz band, but after the boundary is adjusted, that will fall to 47.3%. This is a huge problem because of the quantity of N-GB range equipment currently in use. More detail on BEIRG's position on this issue can be read in question 4 of our response to Ofcom's consultation on support for PMSE equipment owners.

BEIRG would also welcome detail on whether Ofcom plans for the spectrum to be accessed on a coordinated basis or on a Shared UK licence. There are benefits to both approaches; professional PMSE users would prefer access on a coordinated basis while a Shared UK licence would benefit smaller users. BEIRG believes however that equipment already on the market which covers the 694 – 703 MHz guard band is almost exclusively professional grade, which means it makes the most sense to allow access to the spectrum on a coordinated basis. If the spectrum is useable, we believe that coordinated spectrum in an area without DTT would be a benefit to the professional PMSE sector, especially in the context of increasingly difficult working conditions in the rest of the band.

### **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 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)<sup>1</sup>, 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.

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<sup>1</sup> <http://www.apwpt.org/>