

Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

UK preparations for the World Radiocommunication Conference 2019 (WRC-19)

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A note on PMSE and WRC-19

After WRC-12, in which some countries supported the re-allocation of the 700 MHz band despite it not appearing on the conference's agenda, BEIRG urges Ofcom to be vigilant in defending Programme Making and Special Events (PMSE) access to the remaining UHF.

PMSE is supposed to be guaranteed access to the 470-694 MHz band until at least 2030, but having heard similar statements ahead of the decision to clear the 700 MHz band, BEIRG would like Ofcom to make a strong case for PMSE's continuing access to the 470-694 MHz band up to and beyond 2030.

PMSE has already lost access to the 800 MHz band and will soon lose access to the 700 MHz. The pace of change is already making it extremely difficult for the PMSE industry to adapt to an increasing dwindling supply of spectrum, both in terms of manufacturing more frequency efficient equipment and in terms of the availability of sufficient frequency planning skills. Any further reductions to the availability of spectrum for

PMSE would bring the industry to breaking point, making it impossible to stage the highest profile, most economically and culturally significant events in the UK.

Aside from protecting PMSE access to the UHF bands, Ofcom should also use WRC-19 as an opportunity to promote the use of the 961-1015 MHz, 1045-1075 MHz, and 1105-1154 MHz bands for PMSE use, whether through formal or informal channels at the conference.

Answers to specific questions

Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?

The 410-470 MHz bands are used extensively for PMSE for narrow band radio communications known as talkback. UHF 2 (450-470 MHz) is particularly crucial to the industry and accounts for the vast majority of talkback channels. The band is the lifeblood of TV and film production as well as many theatre productions and other live events. Timely and effective wireless communication with the crew – be they audio, video, lighting, props, machinery automation or stage management – is crucial to the success and safety of live events. Complex events require talkback to ensure not only the smooth running of a production, but also the safety of all those working backstage; crew, cast, orchestra etc. The UHF is the only band that provides the right conditions for this application and has the right technology available. The continuing importance of the 400 MHz band to the PMSE industry cannot be overstated.

For this reason, Ofcom should ensure that any upgrades to the secondary MetSat allocation and consideration of a primary allocation to EESS between 460 and 470 MHz protects incumbent PMSE use. We support Ofcom's stated position that the UK has 'significant interests in continuing terrestrial use of the band and that any limits should respect that continued use'.

Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?

In discussions around Agenda Item 10 – future WRC agenda items – the UK administration must be clear that the 470-694 MHz band should remain for use by DTT and PMSE beyond 2030. Ofcom should oppose any attempts to table an agenda item which could lead to loss of access to the band, , or to any further part or parts of the band, for PMSE.

BEIRG would also like to see Ofcom champion a more strategic approach to managing the spectrum available for PMSE, especially in an international context. Too often, changes to PME frequency allocations are the result of expansions to other services, despite the immensely valuable cultural and economic contribution made by PMSE. International administrations are not working together well enough to identify and allocate alternative spectrum in response to steadily diminishing available spectrum. We are in danger of having a situation in which there are piecemeal spectrum allocations for PMSE around the world, making it difficult for manufacturers to make a business case for building new equipment and for touring productions to travel between different administrations.

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/>