

Ofcom Consultation

British Entertainment Industry Radio Group (BEIRG)

Proposals for the award of the 800MHz and 2.6GHz spectrum

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Introduction

This is the British Entertainment Industry Radio Group (BEIRG) response to the Ofcom consultation on “*Proposals for the award of 800MHz and 2.6GHz spectrum*”.

The British Entertainment Industry Radio Group (BEIRG) is an independent, non-profitmaking association 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. It is responsible for both content production and delivery for live and recorded entertainment. It plays a crucial role in the on-going success of the £15 billion p.a. British Entertainment Industry. On a daily basis this sector is responsible for the production of content that receives world-wide acclaim and continues to attract a global audience. A vast array of organisations are reliant on radio 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

The sector relies upon wireless equipment such as Wireless Microphones, Wireless In-Ear Monitor Systems, Wireless Talk Back Systems and Wireless Instrument Systems. Over the past 50 years Wireless (Radio) Microphones have played a key role in television and radio program production. The high level of audio quality, convenience and ease of use has led to their deployment across all areas of event production. Wireless microphones are used in a wide array of events, including film production, theatrical performances, live sporting events, religious worship and political conferences.

The PMSE sector has historically relied on Channel 69 and the interleaved spectrum between existing TV Broadcast channels to enable the use of Radio Microphones, In-Ear Devices and other short-range wireless devices. Channel 69 has for many years been the only channel dedicated solely to UK-wide operation of PMSE equipment. From 2012, PMSE users will be prevented from using channel 69, and will be forced instead to operate in channel 38 for national coverage. As a result, 55% of the cost of funding for replacing equipment rendered redundant by the move has been made available to qualifying licenced users. Despite this, the industry has suffered great disruption as a result of the clearance of the 800 MHz band. It is essential that this important industry suffers no further negative disruption as a result of the impending auctions.

Response

1. This response from the British Entertainment Industry Radio Group (BEIRG) focuses on the issue of extending PMSE access to channel 69, and the scope of future consultations on this issue.
2. Question 4.1: *What use, if any, would you make of the top 2x10 MHz band in the second half of 2012 if it were available for use? What would be the benefits for citizens and consumers of such availability?*
 - 2.1. A large number of licenced users will already have surrendered their equipment before channel 69 is officially closed to PMSE use.
 - 2.2. BEIRG would welcome the opportunity to extend PMSE access to channel 69, to ease the transition for those users who continue to hold equipment which operates in channel 69. These may be licenced users who have retained some of their equipment to use in channel 70, or those users who were not eligible for funding to cover some of the cost of replacing channel 69 equipment with that which can operate in channel 38.
 - 2.3. Should this extension to access be granted, Ofcom should also use the time to further promote the closure of channel 69 to users. BEIRG members continue to encounter users of wireless microphones who have no knowledge of the future denial of access to channel 69.
3. Future Consultations
 - 3.1. BEIRG believes that future consultations must address the minimum technical conditions required to manage risk of interference from new users to adjacent users. Ofcom should ensure that any new services in channel 69 do not interfere with services in the band between 863MHz – 865 MHz ('channel 70'). Applications that operate in the 863MHz – 865 MHz band include hearing aids, wireless headphones, wireless microphones, tour guide systems and other consumer audio applications, all of which must be protected from out-of-band interference.
 - 3.2. Following PMSE's eviction from channel 69, many users have been advised by Ofcom¹, Equiniti² and the PMSE band manager JFMG³ that channel 70 is available to them as alternative to channel 69. Indeed, many ex-channel 69 users have equipment which is still able to operate within channel 70. Ofcom must protect those users who are now migrating to channel 70. If no protection is afforded to channel 70 users by the regulator, then it is essential that Ofcom makes every effort to warn users that channel 70 will become unusable once new services come online. Any channel 70 users who find that they can no longer operate due to interference caused by new services in 790 – 862 MHz should be able to apply for compensation.
 - 3.3. Tens of thousands of systems which operate on channel 70 are sold each year. Ofcom, and its agents, must not continue to advise users to move to channel 70 until they have

¹ <http://media.ofcom.org.uk/2010/08/05/ofcom-explains-how-government-funding-package-for-wireless-microphone-users-will-work/>

² <http://www.shareview.co.uk/clients/Ofcom/Documents/OfcomFrequentlyAskedQuestions.pdf> p.15

³ <http://www.jfmg.co.uk/pages/equip/Radiomics/dtv.htm>

undertaken testing to ensure that channel 70 will not suffer interference from adjacent users. Channel 70 devices are particularly susceptible from interference from new services as they were not originally designed to function in an RF environment in which high powered digital transmitting devices could be operating on adjacent frequencies, in physically close proximity. At point of design, manufacture and sale, there was no expectation that these devices should have to co-exist with high power mobile services.

3.4. Ofcom must make every effort to ensure that new use of the 800MHz band is as clean as possible, as soon as possible. Given the disruption already faced by the PMSE sector, any further detrimental impact would be unacceptable.

3.5. BEIRG believes that in the case that new service operators do breach the technical conditions of their licence, and cause interference to adjacent users, this must be considered a suitable condition for their licence to be revoked. Existing PMSE spectrum users must be protected from interference caused by new technologies within the 800 MHz band.

4. Conclusion

4.1. From late 2012 all PMSE users will be cleared from the 800 MHz band. The clearance of PMSE from this band has caused a great deal of disruption to the entertainment industry, and has imposed a high financial cost on that industry.

4.2. BEIRG urges Ofcom to ensure that this valuable industry suffers no further damage from the re-allocation of the 800 MHz band. Ofcom must ensure that PMSE users in adjacent channels are protected from interference.

4.3. Whilst welcoming the opportunity to further ease the transition of PMSE users out of channel 69, BEIRG advises Ofcom to use this time to ensure that all wireless microphone users, licenced or unlicenced, are aware that their equipment will soon be unusable in channel 69.