

## **Ofcom Consultation**

### **British Entertainment Industry Radio Group (BEIRG)**

#### ***Notice of Ofcom's proposal to make a limitation order in connection with the potential award of the 600 MHz spectrum band - Response***

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## **British Entertainment Industry Radio Group Response to Ofcom Consultation “Notice of Ofcom’s proposal to make a limitation order in connection with the potential award of the 600 MHz spectrum band”**

BEIRG welcomes the decision to award interim access of the 600 MHz band to both DTT and PMSE. BEIRG still has concerns about allowing WSDs into the band, given the potential for interference with PMSE services. However, BEIRG is aware this is an area which Ofcom is working on. Whilst the decision to allow PMSE services in the 600 MHz band is welcome, whether or not DTT multiplexes are established there, BEIRG does have concerns about the long term future of PMSE in this band, and the delay in making this decision. PMSE operators were told that they would have to move out of the 600 MHz band. The sector needs long term security, to provide confidence to the industry in terms of making investment in equipment and offering continuing stability to businesses.

BEIRG would like to restate their view that Channel 36 should be considered as part of a larger contiguous block of spectrum in the medium to long term. Furthermore, BEIRG is generally in favour of 600 MHz remaining as a single lot, rather than being split between several users. PMSE requires continuous access across several channels to operate effectively. If this is removed, the PMSE sector will suffer from a lack of clear spectrum, content production will be greatly affected, and this may subsequently provoke excessive costs to the industry in repurchasing or retuning new equipment. It will also have a wider knock-on economic impact. Ideally, therefore, BEIRG would prefer the 600 MHz band to be awarded as a smaller, single lot, with a separate, contiguous block of spectrum, dedicated for PMSE use. This block should be allocated on the basis that PMSE is its primary user and should consist of at least 3 contiguous 8 MHz channels.

It should be ensured that no interference will be generated by any new services that might adversely impact on PMSE equipment operating in 600 MHz. At present, the proposed modulation schemes outlined previously have not been sufficiently tested for compatibility with PMSE. Whilst BEIRG can see that it is beneficial to consumers to having multiple parties applying for the award of 600 MHz, it is essential that the award should not go to a party which cannot fully demonstrate how it will ensure that there is no negative impact on the ability of PMSE to provide its services. If Ofcom considers the party which made the single Notice of Interest to Apply to become the potential licence holder, part of this consideration must ensure the interested party can demonstrate such a capability.

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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. Productions that depend on radio spectrum include TV, film, sport, theatre, music, newsgathering, political and corporate events, and many others. In the context of the Digital Dividend Review (DDR), BEIRG campaigns for the maintenance of Programme Making and Special Events (PMSE) access to sufficient quantity of interference-free spectrum.