

British Entertainment Industry Radio Group (BEIRG)

DCMS consultation

Statement of Strategic Priorities for telecommunications, the management of radio spectrum and postal services

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Executive Summary

- The group of industries that PMSE serves generates in excess of £90bn per annum for the UK economy¹ – providing employment, premium quality content, cultural diversity and stable tax revenues.
- BEIRG has three main priorities for 2019/20: ensuring that the process of swapping equipment and receiving compensation is managed in a smooth and easy to navigate fashion; ensuring that all those impacted by the clearance of the 700 MHz band are left no worse off; and campaigning for Ofcom to redress the shortfall of spectrum for PMSE caused by the 700 MHz band clearance.
- BEIRG is grateful for the work undertaken to identify the new bands of spectrum for low power audio PMSE sharing. However, there is still much to do to make the use of these bands a practical success.

¹ <https://www.gov.uk/government/statistics/dcms-sectors-economic-estimates-2017-gva>

- BEIRG further encourages DCMS and Ofcom to provide security of tenure for PMSE and rule out a further eviction to alternative spectrum in the future. Whilst the opening up of portions of the 960-1164 MHz band, as partial spectrum compensation for low power audio PMSE's loss of access to the critical 700 MHz band, is to be welcomed (BEIRG greatly appreciates the efforts of those individuals within Ofcom UK who have worked tirelessly to make this happen) there is, however, nothing in the statement that secures access to the sub-bands in the medium to long term. It is conceivable that, over time, new aeronautical systems could be developed and placed into the sub-bands, effectively squeezing PMSE services out. It would be highly regrettable if equipment for the sub-bands were to be developed by manufacturers and purchased by PMSE users with funds distributed as a result of the funding scheme, only to find that in a relatively short space of time, this equipment is rendered redundant too, as a result of changes in spectrum usage that are out of the control of the PMSE sector. If security of tenure cannot be assured for the 960-1164 MHz sub-bands, then alternative spectrum bands, ideally in line with those identified in ECC REC 25-10 and REC 70-03, should be allocated to PMSE, along with long-term security of tenure.

Introduction

BEIRG has long called for Ofcom UK and DCMS to redress the shortfall of spectrum for PMSE caused by the 700 MHz clearance. Whilst it is hoped that the move from 700 MHz is smooth, there are still many unanswered questions about a long-term home for PMSE and availability of suitable equipment in any new spectrum. Additionally, BEIRG trusts that the principles of the Lamy Report will be upheld and that all affected PMSE users will be left no worse off by the 700 MHz move. At present, this would not appear to be the case.

World-class digital Infrastructure

BEIRG notes that Ofcom has identified and opened up the 961-1015 MHz, 1045-1075 MHz, and 1105-1154 MHz spectrum bands for PMSE sharing. However, currently, the bands remain a UK-only solution, limiting their attractiveness to manufacturers and limiting the quantity, cost and range of equipment that may be available for use in the bands. BEIRG urges Ofcom to continue promoting the shared use of these bands in international forums and to fully commit to ongoing discussions within CEPT on the subject.

BEIRG remains concerned that PMSE users have had the available spectrum for their industry reduced time after time. Section 33 of the document states that one of the four strategic priorities is to "Promote new 5G services from existing and new players through the release of additional spectrum". DCMS then go on to state that the introduction of flexible shared spectrum models is a strategic priority. Whilst the PMSE community appreciates that there is a need to become more spectrally efficient, and has been working towards this aim for some time, the spectrum available cannot be cut so much that this becomes an impossibility. PMSE users are also constrained by the capabilities of the equipment manufactured and therefore DCMS must ensure that there is adequate spectrum available.

BEIRG suggested in our response to Ofcom's annual plan consultation that a programme of work surrounding new, additional spectrum for PMSE should be added to their work for the forthcoming year. The success of any review will be contingent on how it is implemented and Ofcom and DCMS should not lose sight of this. BEIRG is concerned that Ofcom considers the work on the PMSE review complete because it has identified and allocated some new spectrum (960-1164 MHz). However, as discussions within CEPT have amply demonstrated, the opening up of this band (or sub-bands) for sharing between low power audio PMSE and aeronautical services is

deeply controversial, with many CEPT administrations dead set against allowing the deployment of low power audio PMSE in the band, more on points of principle than on solid technical arguments. If no other CEPT administrations agree to open the band for sharing, then this will restrict the band to a UK only market for equipment. This, in turn, makes the prospect of producing equipment for the band unattractive to manufacturers. While it is to be broadly welcomed that Ofcom UK have recognised the challenges that the 700 MHz clearance will create for the PMSE sector and has taken steps to mitigate, both in terms of new spectrum access and the funding scheme, the failure of other CEPT administrations to embrace Ofcom's bold and innovative actions, leaves the sector in a very difficult position. BEIRG encourages Ofcom UK to actively and positively engage with other administrations and the ITU, in an effort to bring them into line with Ofcom's position on the band(s).

Funding for all PMSE users

It is worth noting that whilst the amount of spectrum is being squeezed from PMSE users, they face further challenges. The 700 MHz band clearance will mean that PMSE equipment which currently operates in the band will become unusable. The principles of the Lamy Report – that PMSE stakeholders should be no worse off must be adhered to, particularly in these circumstances as the move from 700 MHz was not at the request of the PMSE sector. BEIRG was pleased that Ofcom increased the amount paid to claimants for additional costs from 5% to 10%. This is a more realistic figure to cover the extra costs which are likely to be incurred by the move. However, disappointment remains that those impacted by the move from 700 MHz (and therefore incur costs) but do not own equipment have no opportunity to reclaim these costs. We urge DCMS to correct this anomaly so that our world class creative industries can continue to provide outstanding content.

Conclusion

The PMSE sector, along with the rich and varied industries that it serves, faces a damaging loss of spectrum access as a result of the 700 MHz spectrum clearance. This loss of spectrum access will make it more difficult to stage some of the country's largest and most culturally significant events and will hamper the growth of the PMSE sector and the wider creative industries, thereby ultimately ensuring loss of revenue to UK plc – the UK cannot afford to compromise a creative sector that generates in excess of £90 billion per annum. BEIRG appreciates that DCMS and Ofcom have recognised the problem and have worked to mitigate the shortfall. The question is, has enough truly been done to safeguard one of the UK's 'Jewels in the Crown' and ensure world class content continues to be produced. It is crucially important that PMSE, once through the process of moving from 700 MHz, with all of its associated disruption, is given re-assurances by Ofcom and Government that their new 'home', or 'homes', will remain stable for a considerable period of time.

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)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 in the long run.

²<http://www.apwpt.org/>