

**Response of APWPT to the Public Consultation
on the Draft RSPG Opinion on the ITU-R World
Radiocommunication Conference 2019**

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Introduction

APWPT welcomes the opportunity to provide comments on the draft RSPG opinion on the ITU-R World Radiocommunication Conference 2019 (WRC-19).

APWPT represents the interests of its members who use radio spectrum in the fields of art, culture and the creative industry. Current studies (e.g. Europe's Creative Hubs Update 2018 published by Enders Analysis and Bertelsmann¹) demonstrate the impressive economic effect of the cultural sector and its ability to create stable employment for hundreds of thousands of people, across Europe.

One key factor to maintain the sector's success and to expand the EU as a place of business for these creative industries will be the continued provision of high-quality radio spectrum for the use of wireless production tools (e.g. wireless microphones, wireless in-ear monitor systems, service/security links and wireless cameras - commonly referred to as PMSE - Program Making & Special Events).

The ITU-R Radio Regulations (WRC-15) already contain a footnote (5.296) confirming the importance of 'applications ancillary to broadcasting and programme-making' (in CEPT known as PMSE). We urge the RSPG to support the implementation of similar footnotes, e.g. for 823-832, 1350-1400, 1518-1525 and 1785-1805 MHz in order to promote continued successful PMSE operations for the benefit of all citizens and consumers across Europe and around the world.

Because Audio and Video PMSE applications have become indispensable to contemporary content and event production PMSE should be seriously considered, at the highest level, in all related frequency band discussions for WRC-19 and far beyond.

¹ Summary available at

<http://www.endersanalysis.com/content/publication/europes-creative-hubs-update-2018>

Quote: "The creative industries in France, Germany and the UK generated a combined total GVA of €161 billion in 2015, the last year of available data. This value was created by the activity of 453,000 "employer" enterprises and their staff of 2.2 million, and excludes the activity of freelancers and micro-enterprises, a characteristic feature of the sector."

This will require the strong support of the European Commission and the RSPG. APWPT's goal is to achieve broad support for PMSE from all member states of the European Community and beyond.

In addition, the RSPG should seriously question any initiative that affects the existing footnote 5.296. Any such request must be questioned at an early stage, be fully discussed and officially commented on to fully evaluate its potential impact on PMSE.

It is essential that the cultural and creative sector is allowed to continue to flourish and grow by ensuring that it has sufficient radio spectrum to continue to thrive. It is a major economic driver for Europe generating money in the form of taxes and employment for hundreds of thousands of people. PMSE enables much of the content creation process. Future spectrum policy should not constrain PMSE activities as this will, ultimately, harm the quality of content, productions and events and the EU as a place for business for this sector in competition with other countries and regions.

1.2 The need for an RSPG Opinion

The preparation for a WRC is a demanding task. APWPT is happy to offer its support on the work on an RSPG Opinion, if required.

4.1 General objective

APWPT has been and continues to be an active LoU member of CEPT for years and various members of APWPT attended WRC-12 and WRC-15 as members of delegations or sector members in both conferences. Therefore, our proposals are based on long-term practical experience and APWPT's deep knowledge of the challenges for the PMSE industry.

Following the decisions taken at WRC-15, the UHF-TV Band is currently not on the agenda of WRC-19. However, the experience of the WRC-07 and WRC-12 shows that this situation could change, possibly at the conference itself. We currently see support from about 17 countries for an additional action item on 600 MHz in the Americas. At the recent spectrum conference in Bangkok this topic was also seriously discussed. For this reason, APWPT asks the EC and RSPG to support the long-term availability of the current UHF-TV spectrum - 470-694 MHz - (FN 5.296) for Audio PMSE (applications ancillary to broadcasting and programme-making). This will give the Audio PMSE sector the same planning security that the EC and RSPG is granting to other spectrum users.

As things currently stand, studies on the UHF band (470-960 MHz) will be started in ITU-R after the WRC-19 at the invitation of the WRC-15. Therefore, in WRC-19 we expect a discussion with regards to the related study mandate. It is APWPT's intention to ensure that in these studies the continued use of wireless production tools is properly considered for WRC-19 and beyond.

Given that PMSE is a secondary application, any further changes to the UHF band (300-3000 MHz) and above could have a significant impact on the continued use of Audio and Video PMSE equipment in which content and event producers have invested heavily.

PMSE, in all its forms, is a major tool that is used daily in the production of a vast range of content. Before content is distributed, via whatever network, it needs to be created. Investment in any distribution platform relies on the quality and availability of content that consumers will want to consume. PMSE is vital to the production of that content and sufficient and realistic allowances should be made to meet the PMSE sectors spectrum requirements.

The PMSE sector requires a long-term reliable decision.

4.9 WRC-19 Agenda Item 1.13 (IMT2020/5G)

In Germany, the possible use of 5G technology for Audio and Video PMSE is currently being studied.

5G technology could possibly be an enabler for PMSE if the results from these studies are implemented in the 5G standards. This is an ongoing process, e.g. at 3GPP where PMSE is now represented within this group. It remains an open question as to whether the stringent requirements of content and event production can be adopted in the still to be finalised 5G standards.

The use of 5G technology will not be a substitute for the continued provision of high-quality radio spectrum for PMSE, but it may prove to be an option to adopt, at least in part, to assist with the ongoing growth of the culture and creative sector.

4.11 WRC-19 Agenda Item 1.16 and Issue 9.1.5 (RLAN 5 GHz)

APWPT is concerned about the impact of RLAN 5 GHz. The 5 GHz RLAN band is also an important band for wireless microphone systems for conferencing applications, and we believe that this use should be carefully considered in any allocation arrangement.

4.12 Agenda Item 10 (New Agenda items for WRC-23)

APWPT kindly requests the EC and the RSPG to invite all European nations to invite and support the adoption of new footnotes from WRC-19 in order to support Audio and Video PMSE (applications ancillary to broadcasting and programme-making) into the future.

4.12.1 Link with EU policies

APWPT would like the RSPG to consider:

The mandate of EC and the work of the High Level Group (HLG) that led to the *Lamy* Report in 2014² was very important.

Mr Lamy proposed to:

- (1) Dedicate the 700 MHz band to wireless broadband across Europe by 2020 (plus/minus 2 years);*
- (2) Ensure regulatory security and stability for terrestrial broadcasters in the remaining UHF spectrum below 700 MHz until 2030;*
- (3) Assess technology and market developments by 2025.*

In APWPT's view, the work of the HLG has not yet been completed as there was no consensus on the final report and must therefore be continued. APWPT's members need certainty with regards to any changes in spectrum allocations.

The HLG experience should be taken into account at WRC-19 for the mandate of studies for the UHF band (470-960 MHz).

In parallel to the studies of ITU-R, a new mandate for the European working groups at CEPT will be required to draw up and channel Europe's contribution.

We ask the EC and RSPG to reactivate the HLG and pass on to it this mandate.

4.12.2 Relevant spectrum harmonization decisions

APWPT would like to note: the EU seems able to harmonize 1200 MHz for IMT, but not identify sufficient replacement frequencies for PMSE, in particular, with regards to future loss of access the 700 MHz band.

Mr. Lamy has stated in his report that

- *Content production for all platforms must be protected through the future use of spectrum in the UHF band, including for PMSE. Alternative spectrum should become available in the future for PMSE in other frequency band (at 11).*

² Report available at

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=6721

and RSPG reaction at

<http://rspg-spectrum.eu/wp-content/uploads/2014/09/RSPG-press-release-LAMY-report.pdf>

- *Any changes in spectrum use would need to safeguard the important benefits that DTT and PMSE services deliver to citizens and consumers. Specifically, Member States should ensure that broadcasters and PMSE users are left no worse or no better off than they would have been without any clearance of the 700 MHz band.*
- *Clearing the 700 MHz band would be likely to involve significant disruption and cost to the broadcast industry, PMSE and citizens.” (at. 12)*

APWPT trusts that the sentiment expressed in the report will be honoured and that PMSE users will not be left “no worse or no better of” after the clearance.

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Permission to publish our comments

APWPT agrees that these comments can be made public by the RSPG.

July 20th, 2018