

**Update of the RSPG Work Programme
RSPG WP “2014 and beyond”
Public consultation**

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By e-mail to CNECT RSPG (CNECT-RSPG@ec.europa.eu)

PEARLE*-Live Performance Europe welcomes the opportunity to present its comments on the draft Radio Spectrum Policy Group work programme 2014.

Pearle* represents through its members associations more than 5,000 theatres, theatre production companies, orchestras and music ensembles, opera houses, ballet and dance companies, festivals, producers, comedy, variété, circus and other organisations within the performing arts sector across Europe. It concerns both non-profit organisations and commercial enterprises. It varies from professional small scale production companies, music bands and touring companies, to large theatrical organisations employing over a thousand people.

These organisations rely on the use of audio (and video) technology and in-ear monitors to accommodate audiences across Europe and beyond live performances with top audio quality and technical conditions. Such performances are categorised within the PMSE group.

Pearle* welcomes the fact that the draft RSPG Work Programme foresees considering, in its various reports and opinions, issues of importance for PMSE. In that context, Pearle* wishes to present the following comments:

Draft RSPG Work Programme “2014 and beyond”:

In the context of the development of the telecom single market, and in view of the planned opinions and reports of the RSPG, Pearle* would like to underline the need for a transparent and clear policy in the EU which aims for a genuine **coexistence** between different users of radio spectrum. As a general principle, the deployment of a particular service or sector must not impact another in such way that it jeopardises the sustainability of an existing service.

Long-term strategy on the future of the UHF band in the EU :

Pearle* welcomes the focus on a long-term strategy. In the draft text it is mentioned that: *“In order to ensure a sustainable win-win situation for sectors as well as consumer benefits, an EU strategy needs to be developed on the future use of the 700 MHz band in the context of the whole UHF band taking into account all political, economic and technical elements”*. In addition it needs to be underlined that also **social and cultural** elements must be taken into account. This would also be in line with the general objectives of the RSPP.

Taking into consideration the ECC report 204¹, it is recommended for the RSPG programme to include in **the scope of the activity** planned, the following additional point: “Identifying possible spectrum to accommodate PMSE in the 694-790 MHz band, while examining the possible impact on usage of spectrum by current incumbents including PMSE.”

Following the digital dividend of the 800 MHz which resulted in major costs following the investment in new equipment, a win-win situation for all sectors on the 700 MHz should aim for a strategy that provides conditions so that users who deploy services or devices which exchange in a short-term timeframe do not hinder those users which exchange equipment at a mid-term or longer term (in the case of wireless microphone equipment, the average lifespan is 8 years²). The latter otherwise faced with costs which are at the detriment of the viability and sustainability of a sector such as the live performance. Any long-term strategy could therefore only look beyond a period of ten years or more.

To conclude, Pearle*’s main objective in the context of radio spectrum usage is a recognition of the role of culture, which as a public service relies on the public sharing of spectrum. In order to bring performances to small or large audiences in indoor and outdoor settings, to people of all ages, live performance organisations need:

- a guarantee to be able to access spectrum at an affordable cost for any type of the thousands of organisations (usually small enterprises),
- to be able provide the best audio (and video) quality,
- to be free of interference from other devices or users (and thus protected),
- a coordinated approach allowing touring productions to present across Europe and the globe.

For any further information, please contact Anita Debaere, Director Pearle*-Live Performance Europe (anita@pearle.ws , tel +322-203.62.96)

¹ ECC report 204 on Spectrum use and future requirements for PMSE <http://www.cept.org/ecc/tools-and-services/ecc-public-consultation>

² Report on Assessment of socio-economic aspects of spectrum harmonisation regarding wireless microphones and cordless video-cameras (PMSE equipment) (23/09/2013) <https://ec.europa.eu/digital-agenda/en/news/report-assessment-socio-economic-aspects-spectrum-harmonisation-regarding-wireless-microphones>