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Reaction on report RSPG21-014 FINAL

Public Consultation on the Draft RSPG Opinion on a Radio Spectrum Policy Programme (RSPP)

Utrecht, March 25, 2021

PMSE.nl welcomes the opportunity to respond this consultation on the RSPG Opinion on 5G implementation challenges.

From the position of the interest group for wireless industry PMSE.nl we welcome the opportunity to respond to this consultation on the RADIO SPECTRUM POLICY GROUP Opinion RSPG21-014. We like to respond to the consultation with a focus on the consequences that our sector may experience.

Our members want to have safe frequency for use in making programs and special events (cultural productions, radio, television, sports competitions and festivals). These services are internationally called PMSE: Program Making and Special Events. ENG / OB is also used international. The safe use of frequencies and content is of crucial importance to the events sector.

Spectrum Sharing

Basically, we want our own frequencies for PMSE-usage. Partly because we sometimes need more spectrum, depending on the event, we want to encourage more dynamic sharing of spectrum. The (intelligent) coordination of spectrum in time and place gives less interference and spectrum-efficiencies.

The RSPG recommends that Member States continue to investigate parts of the investigation opportunities between spectrum use for public order, security and defense purposes, and other spectrum uses where possible. We will be happy if sharing opportunities and ensuring efficient spectrum management will give safe spectrum for large events.

The PMSE sector wants to prevent or limit disruption of mutual processes as much as possible but we need frequencies to make events.

We want to be able to operate independently and not be dependent on other people's networks. We would like to use our own data applications. By using our own networks locally, we can better distribute the necessary digital information and keep it stable. We therefore need to be able to use audio-visual and data equipment in own PMSE spectrum.

Spectrum needs and supporting EU vision/policies:

The UHF 470-960 MHz band is on the agenda for the upcoming WRC23 conference and RSPG intends to make a recommendation to the EC on an EU position accordingly in its opinion on WRC23. The current Council and Decision of the European Parliament provides legal certainty on land until 2030. The PMSE-user is often a secondary user of white space (next to the primary user).

We agree with the RSPG that the future of broadcasting and PMSE is related the UHF band 470-694 MHz will not be subject to a new RSPP. The UHF white spaces are of crucial importance for microphones and in-ear systems.

The PMSE-sector welcomes the view of the RSPG that the future of broadcasting and PMSE, in regard to the UHF Band 470-694 MHz, shall not be subject of a new RSPP.

The uncertainty around the UHF band (including terrestrial broadcasting) has to be solved for the coming 5-10 years. We agree that legal certainty to terrestrial broadcasting including conditioned national flexibility and PMSE-use gives some space to invest in future equipment .

National coordination/European Coordination

Coordination and cooperation between the member states is important to come up with new equipment. National coordinators could already launch initiatives to learn from other states, or to implement the EU/RSPG advices more quickly. A total vision from the market is more important than a local vision.

Licensing and Spectrum Awards

The solutions for local permits depend on the national situation and the spectrum availability. RSPG encourages Member States to participate based on national legislation actions in the field of digitization of processes, such as the automation of individuals authorization based on a first come / first served license.

When the spectrum demand is greater than the supply, the government must use a different mechanism to grant the licenses. Governments have increasingly turned to comparative hearings or “beauty pageants” and more recently to spectrum auctions (ITU, 2004).

The question is whether this provides a suitable distribution of temporary spectrum in a small area (such as PMSE-use). We think if spectrum is (temporary) not used, it must also be possible to return spectrum to the administrator. The traditional spectrum management regime favors existing services but changing circumstances will require the rapid adaptation of new technologies and new types of uses to existing uses. Opening changed frequency bands does not go at the same pace and does not always offer a solution. This means that the spectrum management authorities have more or less hardly usable radio spectrum anymore, because of the increasing demand and the allocation of radio spectrum for new services and technologies. Therefore, currently, new technology-based services can only be introduced at the expense of radio spectrum for existing services. As a result, the PMSE sector lost more than 300MHz in the past ten years

Pandemic response

The PMSE market has learned that PMSE equipment is very important during a pandemic.

The use of equipment for use at home and to webcast has grown (wireless in-ears/microphones/intercom systems).

We welcome that the RSPP will promote the role of wireless connectivity for the functioning of our economy and society during all sorts of crisis, in particular during a pandemic period and subsequent recovery. Innovative methods to enable faster spectrum award procedures should be investigated.

According to effects of changing consumption patterns and regarding spectrum policy.

Yours faithfully,

Mr B.W. Westermann

President of PMSE.NL

Representing our members:

Ampco Flashlight, Utrecht
Audio Electronics Mattijsen BV, Duivendrecht
Audio XL, Utrecht
Broadcast Rental bv, Hilversum
De Herrieboerderij, Duivendrecht
Facility House, Hilversum
Focus Amsterdam, Amsterdam
H.F. Prints, Lelystad
Hoens Broadcast Facilities B.V., Loosdrecht
Iemke Roos Audio BV, Amsterdam
Monacor Nederland BV, Malden
Nederlandse Associatie voor Podiumkunsten, Amsterdam
NOS, Hilversum
Noyz Boyz Advanced Audio Services BV, Amsterdam
Nederlandse Publieke Omroep, Hilversum
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