

Response to;

Draft RSPG Opinion # 5

**The Introduction of Multimedia Services in particular in the
frequency bands allocated to the broadcasting services**

(11-05-2006)

Introduction

In the rush to provide new wireless services to a potentially huge consumer (end user) base, as a result of the DDR, there is currently a high level of debate and consultation surrounding the frequency allocation and bandwidth requirements for these perceived new services. Part of the spectrum being considered for use by these embryonic services, whilst being vacated by analogue broadcast transmissions, is heavily used by the Programme Making & Special Events (PMSE) sector - the content providers.

Who are we?

BEIRG is an independent and non-profit making trade association for all those who use radio spectrum in the entertainment industry. Our aim is to continue to produce the high standard of professional entertainment created in the UK and enjoyed by a worldwide audience. We will promote our industry's need for continued access to the quantity and quality of radio spectrum needed to achieve this goal.

www.beirg.org.uk

Purpose of This Response

Change is a constant. Whilst we recognise the need to establish new 'methods of delivery' BEIRG wishes to register the fact that significant amounts of spectrum, particularly in the 470-862 MHz region, are required and used every day, not just in the UK but throughout Europe, to actually make program content. As an industry, the PMSE sector has evolved symbiotically with the broadcast sector, filling the areas of broadcasting spectrum between broadcast coverage areas to enable the creation of content. Areas of activity include, amongst others:

Theatre
ENG - Electronic News Gathering
Outside Broadcast - e.g. sports events
Concert Production
Film Production
TV Production
Education
Local Government
The Law Courts

Wireless microphones, IEM (In-Ear Monitor Systems) and talkback systems are a basic pre-requisite for all of these productions. The content generated by these productions form the 'meat and drink' of news and entertainment for millions of citizen consumers not only here in the UK but across Europe and the Globe.

The UHF Band IV and V slice of spectrum has been shared successfully by TV broadcasting and PMSE for more than 20 years. The use of UHF Band IV and V for PMSE activities continues to increase rapidly even in the presence of simultaneous analogue and digital TV broadcasting in the UK. **Access to clean, useable spectrum to enable the PMSE sector to continue to deliver program content is critical.**

PMSE Equipment Manufacturers

From a PMSE equipment manufacturers perspective, at the present time, there is no viable alternative technology available that would make it possible to reduce the amount of spectrum required or to switch to an area of spectrum other than UHF. With the lack of alternative spectrum availability, there is no incentive for manufacturers, current or prospective, to either invest in or to try innovative technology. Additionally, from a technical standpoint, other frequency bands may not have the necessary propagation characteristics for PMSE use.

PMSE Equipment Users

From a PMSE equipment users perspective, there is a huge amount of RF equipment already 'out there' representing a vast investment that is being used to deliver content in the areas mentioned above, every day. Is all of this equipment to become redundant? If so, how will the programmes demanded by the ever- expanding broadcast channels be made?

PMSE Consumers

We are all PMSE consumers. If you have ever watched television, seen a movie, listened to radio broadcasts, visited the theatre, attended a large sporting event or been to a gig, either rock or classical, you will have benefited from PMSE. Any reduction of access to clean RF spectrum will have a detrimental effect on all of these activities.

Conclusion

Please be aware of how the content that we all watch, listen to and consume, is brought to our eyes and ears. There is a balance to be struck between content production and delivery to citizen consumers.

We would welcome more detailed dialogue and discussion. It is in everybody's interest that we go forward with a plan that benefits all.

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BEIRG
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