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Response to the public consultation:

Aspects of a European Approach to Collective Use of Spectrum Area: EU

Body: RSPG

Topic: The Radio Spectrum Policy Group (RSPG) is inviting comments on a draft opinion for a coherent EU-wide approach to the collective use of spectrum (CUS). The opinion suggests ways in which regulators can make CUS available to stimulate innovation, rather than formulating policy as a response to demand from manufacturers.

Introduction:

PWMS, professional wireless microphones systems, are critical to the production of content for live entertainment of all genres. The PMSE sector (Program making Special Events) is extensively utilises wireless equipment such as Wireless Microphones, Wireless In-Ear Monitor Systems, Wireless Talkback Systems and Wireless Instrument Systems. The PMSE sector currently relies on the spectrum interleaved between existing TV broadcasts, to enable the use of Radio Microphones, In Ear- Devices and other shortrange wireless devices. This equipment is an essential component of the European Entertainment Industry.

On a daily basis this sector is responsible for the production of content that has big influence on European cohesion in culture, media, social and education. A vast array of organisations are reliant on radio spectrum for the production of content for **Performing Arts, Broadcasting, News Gathering, Independent Film and TV Production, Corporate Events, Concerts, Night Venues and Sports Events**. In addition, other sectors that utilise the current UHF spectrum include the Health Service, Education, Local Government, Political Programming and Conferencing.

Comments:

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4.1 (page 7):

In some cases the risk of harmful interference to licence exempt devices may also be an issue. Quality of service may be high, but protection cannot be guaranteed which may cause problems for some types of services. The regulatory environment for devices working under a CUS allocation should provide clear directions regarding the obligations and behaviour (politeness) of the devices. While this should help to mitigate interference through lower power or new technologies, the incentives to minimise interference may not be obvious as the benefits may be to neighbours or incumbents, who will receive less interference, rather than to the user deploying the new technology.

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Accepted Level of interference = No degradation of audio signal

Please note that the accepted level of interference cannot be compared to any other service. Wireless microphone systems are the first part of the production chain and the requested audio performance is CD-Quality with a 100 % duty cycle. Moreover higher audio quality is requested for future applications. Therefore professional wireless radio microphones need a protection against interference, which has to be taken into account in spectrum planning.

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Annex A

Spectrum bands currently designated for CUS

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The table covers the frequency band 863 – 865 MHz, a harmonized band for audio applications.

Please be aware that PMSE equipment frequencies are managed through a controlled-CUS approach in many European countries in the band 470 – 862 MHz.

- The number of equipment is not known as it must not be licensed.
Examples:
France: 470 – 830 MHz
Netherlands: 470 – 862 MHz
Portugal: 470 – 862 MHz
Germany: 790 – 862 MHz
and other countries ...
- Different wireless equipment (Talkbacks, Wireless microphones, Audio Links, In-Ear Systems,...) are used by different applications (TV production, Theatre, Music Band, Conferences,...) at the same time and are coordinated by the user.
The feasibility of self coordination and the capability of finding a frequency with no interference were possible in the past due the availability of the frequency range 470 – 862 MHz in secondary use besides the primary user TV Broadcast.

Summary

PMSE equipment is extensively using the UHF band 470 – 862 MHz. This frequency resource might lose big portion with regard to the WRC07 decision. Furthermore new services are requesting parts of the UHF band, too. We would like to refer to the current work item of ECC TG4: “A recommendation on the best approach to ensure the continuation of existing Programme Making and Special Events (PMSE) services operating in the broadcasting band, including the assessment of the advantage of an EU-level approach as well as an outline of such an EU-level solution if appropriate.”

With regard to the mentioned high potential loss of big portions of the used frequency resource we emphasize the importance of a detailed analysis of the needs of PMSE equipment as well as comprehensive compatibility studies. Especially with PMSE equipment, as this sector has special unique needs and requirements in performance, quality and reliability.