BEIRG
BRITISH ENTERTAINMENT INDUSTRY RADIO GROUP

RSPG Consultation

British Entertainment Industry Radio Group (BEIRG)

[Draft] Opinion on a long-term strategy on future spectrum needs and use of wireless audio and video PMSE applications

Date: September 2017

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British Entertainment Industry Radio Group

The British Entertainment Industry Radio Group (BEIRG) is an independent, not-for-profit organisation that works for the benefit of all those who produce, distribute and ultimately consume content made using radio spectrum in the UK. Venues and productions that depend on radio spectrum include TV, film, sport, theatre, churches, schools, live music, newsgathering, political and corporate events, and many others. BEIRG campaigns for the maintenance of 'Programme Making and Special Events' (PMSE) access to sufficient quantity of interference-free spectrum for use by wireless production tools such as wireless microphones and wireless in-ear monitor (IEM) systems.

BEIRG is a member of the Association of Professional Wireless Production Technologies (APWPT)[1], which promotes on an international level the efficient and demand-driven provision and use of production frequencies for professional event productions, as well as safeguarding such production frequencies for the users on the long run.

Response to Draft Opinion

While the RSPG's recognition that 'long-term regulatory certainty and visibility on spectrum access is desired by PMSE manufacturers and users' is encouraging, the draft opinion falls a long way short of providing, or even advocating, long-term regulatory certainty. The draft opinion provides a good analysis of some of the pressures faced by the PMSE industry but fails to provide an overarching strategy to overcome these pressures. In almost every case, the draft opinion abdicates responsibility for solving the problems faced by PMSE at a European level, and instead places the burden on national administrations or manufacturers. This is not a strategic approach. PMSE manufacturers require harmonised spectrum yet the draft opinion's proposed approach would see further fragmentation of available spectrum, niche markets, and ultimately the gradual

[1] http://www.apwpt.org/

degradation of the industry. The draft opinion notes that PMSE has security of tenure in the 470-694 MHz band up until 2030 but fails to argue that PMSE ***should*** retain access to the remaining UHF. This does not offer any semblance of 'regulatory certainty' and leaves the door open for for future UHF allocations to IMT. It cannot be stated strongly enough that this would be catastrophic for PMSE.

Alternative spectrum

The ongoing clearance of the 700 MHz band represents a significant loss of spectrum for PMSE activities. BEIRG is disappointed that the draft opinion does not advocate the identification and allocation of suitable, harmonised replacement spectrum. As it stands, the draft opinion suggests that national administrations should make additional spectrum available on a country-by-country basis. This will lead to fragmented and varied frequency allocations between different regions, increasing the financial burden on manufacturers to produce equipment and on touring productions to travel between different countries. It is not helpful for national administrations to provide unique alternative spectrum if there is no compelling market case for manufacturers to build equipment for those bands. If PMSE access becomes piecemeal and fragmented, certain markets could lose their ability to satisfy the spectrum demands of the largest events. The draft opinion should therefore prioritise harmonisation of spectrum in revising its approach.

The draft opinion should explicitly recommend that European administrations should look into the possibility of allocating the frequency ranges contained in ERC Recommendations 70-03, 25-10 and the sub-ranges between 960-1164 MHz being pursued by the UK regulator on a continent-wide basis.

60 MHz baseline

BEIRG notes that previous studies have arrived at a different figure for a baseline PMSE requirement[2]. But, in any event, it is not helpful to think of PMSE requirements in terms of a 'baseline.' While only a certain percentage of events exceed the stated baseline in any given year, these are almost always the highest profile and most culturally and economically important events. It is crucially important that these events can continue to go ahead and, as such, the draft opinion should be advocating guaranteed, sustainable access to sufficient spectrum to satisfy peak demand events.

Better equipment and working practices

BEIRG rejects the draft opinion's assertion that the adoption of better working practices could significantly ease the pressure on PMSE caused by the loss of the 700 MHz band. In our experience, the largest events most severely affected by the reduction in available spectrum already use the best working practices and the best available equipment; there is little scope for improvement in the short term for these events.

The draft opinion suggests that the reduction in available spectrum will require smaller events to improve their working practices and upgrade their equipment. This is a problem for two reasons. Firstly, skilled frequency planners are a limited resource; it will be difficult or impossible for smaller events to seriously improve their working practices if the skills to do so do not exist. Secondly, it is unrealistic to expect PMSE equipment owners and operators of all kinds to upgrade and update their inventory without financial help. The 700 MHz clearance entails a significant financial burden for PMSE businesses. If the draft opinion is serious about PMSE improving working practices and purchasing better equipment in the context of early equipment changes and associated programme management costs, it should advocate national administrations providing adequate funding to support PMSE equipment owner through the clearance.

[2] http://www.apwpt.org/downloads/considerationsonthefrequencyresourceofprofessi.pdf

Pascal Lamy's report on the future use of the UHF band[3] was clear that the PMSE sector should be left 'no worse or no better off than they would have been without any clearance of the 700 MHz band.' BEIRG does not believe that the draft opinion adheres closely enough to that principle.

Technological advances

BEIRG is concerned that the draft opinion places too much emphasis on the role of technology in fixing problems caused by regulatory changes. While it is true that technological advances have –and will continue – to improve spectral efficiency, it is important to recognise that manufacturers are private enterprises which respond to commercial incentives and external pressures. It is not helpful to simply 'invite manufacturers and academia to put more effort in research and development in more efficient techniques' without providing incentives to do so, especially since the regulatory environment already requires manufacturers to expend more effort on research and development with less certainty of returns than in the past.

The uncertainty surrounding future access to the 600 MHz band (which the draft opinion fails to address), the lack of a strategic and coordinated approach to identifying and allocating alternative spectrum, and uncertainty surrounding funding to compensate equipment owners displaced by the 700 MHz clearance all contribute to an environment that is adverse to investment in large research and development projects.

The draft opinion expects manufacturers to design and develop equipment for new, as yet unidentified tuning ranges that could vary from nation to nation at the same time as developing innovative, more spectrally efficient equipment, while failing to provide any reassurance that there will be spectrum for equipment in which to operate after 2030. Research and development resources are limited. If European bodies cannot provide marketplaces, incentives, and regulatory stability, technology cannot deliver the panacea that the draft opinion anticipates.

BEIRG welcomes the draft opinion's comment that 'PMSE may benefit from R&D funding of related industries development.' Again however, the draft opinion fails to take any responsibility at a European level and leaves it up to national administrations to decide what, if any, support the PMSE industry should receive for research and development.

Fundamentally however, technological advances are a slow and incremental process. Projects such as PMSE-xG are many years away from delivery, and may not even prove to be technically or commercially viable. The problems facing PMSE resulting from the 700 MHz clearance are imminent. The draft opinion should prioritise solutions to the immediate threats to PMSE, which can only be solved through access to additional, harmonised spectrum.

Conclusion

BEIRG is concerned that the draft opinion fails to take overall responsibility for finding solutions to problems caused by decisions taken at a European level. The draft opinion does not present a coordinated strategy to mitigating the impact of the 700 MHz clearance but instead defers responsibility at every opportunity to national administrations or manufacturers.

The draft opinion needs to recognise that harmonised spectrum is crucial to manufacturers to guarantee a market for their products and to touring productions to limit the logistical costs of taking a show to different countries.

[3] https://ec.europa.eu/digital-single-market/en/news/report-results-work-high-level-group-future-use-uhf-band

But most importantly, the draft opinion needs to be clear that PMSE needs to remain in the 470-694 MHz band. The draft opinion recognises the PMSE industry's desire for regulatory certainty, but there cannot be any 'regulatory certainty' while the 470-694 MHz band is potentially under threat from further IMT allocations.