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**Subject: RSPG Consultation
Work Programme for 2024 and beyond**

The Association of Professional Wireless Production Technologies (APWPT) 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.

Programme Making and Special Events (PMSE) is the term used to describe the wireless communication links that allow the creative industries to transport the captured audio and video content from performers and presenters on location to audiences, either at the venue, at home, or increasingly, on the move. PMSE is primarily divided into audio and video, and each has unique characteristics that need to be catered for.

Content created with PMSE is consumed all over the world on a multitude of platforms. It relates typically to televised sport, outdoor music events, theatre productions, television light entertainment, feature film production and live television news gathering. However, it also encompasses many other applications, for example PMSE is used at exhibitions, house of worships, conferences, and educational institutions. Especially streaming platforms created an increased demand on producing new content, requesting high quality PMSE applications.

Introduction

APWPT thanks the RSPG for the opportunity to respond to its consultation on the “Work Programme for 2024 and beyond”. Our particular area of interest is the future use of the 470 to 694 MHz band within the EU as this band is the primary spectrum resource for wireless audio PMSE applications, such as wireless microphones and in ear monitors, used in a variety of activities such as live music concerts, theatre, sporting events, TV and film production, national events, conferences, education facilities and places of worship.

While we appreciate that the RSPG recognises the need to preserve sufficient spectrum for PMSE needs, we are disappointed that this is only captured in a single paragraph. PMSE is a critical element in many Cultural and Creative Industries (CCI), which themselves are important economic and cultural contributors in every Member State, essential for cultural diversity, strengthens social cohesion and increases Europe’s attractiveness internationally.¹ Studies consistently show the scale of the value of the CCIs to the EU. For example, a 2021 study by EY noted that in 2019 (before COVID-19), CCIs represented 4.4% of EU GDP in terms of turnover, with annual revenues of €643 billion and a total added value of €253 billion, employing more than 7.6 million people.²

The European Commission study on “The situation of theatres in the EU Member States” (published in 2022), highlighted that on its own the Performing Arts sub-sector had the strongest growth among all CCI sub-sectors between 2013 and 2017 of 8.6% CAGR, reaching EUR 44,7 billion in 2017.³ In addition, the study presents the view that theatre and the performing arts:

- Fosters democracy by enabling citizens to understand and accept different points of view.
- Enhances social cohesion by bringing people together and providing the space for various communities to engage.
- Promotes intercultural dialogue through the cross-border mobility of artists and performances, contributing to the awareness and appreciation of the diversity of languages and aesthetics, both within Europe and beyond.

¹ [Data on the cultural sector | Culture and Creativity \(europa.eu\)](https://ec.europa.eu/culture/en/data-on-the-cultural-sector-culture-and-creativity)

² Rebuilding Europe – The cultural and creative economy before and after the COVID-19 crisis: [4b2ba2_1ca8a0803d8b4ced9d2b683db60c18ae.pdf \(rebuilding-europe.eu\)](https://ec.europa.eu/culture/en/rebuilding-europe-4b2ba2_1ca8a0803d8b4ced9d2b683db60c18ae.pdf)

³ [Study ‘The situation of theatres in the EU Member States’ - Publications Office of the EU \(europa.eu\)](https://ec.europa.eu/culture/en/study-the-situation-of-theatres-in-the-eu-member-states)

It is important, therefore, to highlight that the PMSE sector is, itself, a significant contributor to economic and cultural value within the European Union. In this context, spectrum policy for audio PMSE should be recognised in its own right and not as a consequence of other spectrum policy considerations.

Review of PMSE in RSPG Opinions

PMSE has been a subject in several RSPG Opinions and work of the EU. Of specific note there are RSPG15-595⁴; RSPG17-037⁵ and RSPG23-035⁶. These opinions all share a common view that it is important to make sufficient spectrum available for PMSE, that spectrum needs may increase in response to audience expectations for more sophisticated events, and that Member States should look to identify additional spectrum for audio PMSE. Despite this recognition and recommendations to look at opportunities for additional spectrum, no substantive work to identify such spectrum has taken place within the EU or CEPT.

The RSPG Opinions consistently make the same statement that PMSE use is different in different countries – this is incorrect in regard of spectrum needs. The nature of PMSE use is similar across Member States regarding equipment and spectrum demand for events of equal size i.e. an 80 channel event in country A will have the same spectrum demand as in country B, (this is particularly the case for productions). Where differences do occur, they are often caused by different spectrum availability and/or regulations. Furthermore, most countries have large festivals, concerts, sporting, cultural and national events that generate high spectrum demand for audio PMSE. Such events have the greatest economic and social value for their respective countries and are most impacted by reduced access to spectrum. It is important, therefore, that any additional spectrum for PMSE should be harmonised across the EU and not left to national implementations to allow for economies of scale across the CCI value chain.

As recognised in the RSPG Opinions, spectrum availability for PMSE has decreased in the UHF band as demand has increased. PMSE manufacturers have developed, and continue to develop, equipment that meets the requirements of the PMSE industries with improved spectrum efficiency. Even with these improvements, APWPT members already experience spectrum shortages at some events which results in those events being constrained.

⁴ RSPG Opinion on a long-term strategy on the future use of the UHF band

⁵ RSPG Opinion on a long-term strategy on future spectrum needs and use of wireless audio and video PMSE applications

⁶ RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

Conclusion

For many years, RSPG has highlighted the challenges for the increasing spectrum needs of PMSE within an environment where access to that spectrum has reduced. RSPG has, on several occasions, recommended that Member States should look to identify additional spectrum for PMSE to meet this growing demand, but to date there has been no substantive work to identify additional spectrum access on a harmonised basis. The PMSE industry has attempted to initiate work within CEPT to address this issue (and respond to RSPG's recommendations) but these proposals have not been supported by administrations.

It is welcome to see PMSE included in the RSPG's draft future work programme, however, APWPT is of the view that the importance of PMSE and the economic and cultural value it delivers deserves higher prominence in RSPG's consideration. Consequently, APWPT is of the view that RSPG should engage directly with the audio PMSE sector to establish a specific, targeted evaluation to properly understand the issue of future spectrum access for PMSE and identify concrete actions that the EU and Member States can take, on a harmonised basis, to determine the long-term strategy for PMSE.