

Your response

Question	Your response
<p data-bbox="204 465 774 499">Do you have any comments on our proposals?</p>	<p data-bbox="810 465 1054 499">Confidential? – Y / N</p> <p data-bbox="810 539 963 566">Introduction</p> <p data-bbox="810 573 1362 853">BEIRG has worked well with Ofcom in recent years finalising the details of the 700 MHz Funding Scheme and helping to ensure its smooth operation. We have been encouraged by the development of a strong working relationship in which Ofcom have listened to the concerns of the PMSE community and acted upon them.</p> <p data-bbox="810 898 1382 1496">Therefore, it is disappointing to see no mention of PMSE in the Draft Annual Plan, and BEIRG would like to draw Ofcom’s attention to main areas of potential concern for the forthcoming year. With WRC 2023 fast approaching and still finalising their agenda, it is of huge concern to PMSE that Ofcom have not considered this to be an important enough policy setting event to form part of their plans for this year. PMSE represents a wide gamut of technology and application, from large scale sporting and cultural events to services of worships and events at schools and village halls. Despite not always being visible, it is vital, and BEIRG strongly believes it is remiss of Ofcom to exclude our sector from their 2022/23 Annual Plan.</p> <p data-bbox="810 1574 1099 1601">Spectrum Management</p> <p data-bbox="810 1608 1382 2031">As a key stakeholder and contributor to the thriving Creative Industries sector, BEIRG believes it is essential that Ofcom will demonstrate a firm commitment to continue working with the PMSE community, which in turn will give manufacturers the confidence to invest in the future development of technology. When it comes to spectrum sharing, we continue to urge Ofcom to adopt a holistic approach that considers the needs of the PMSE community. We have demonstrated that we are good sharers of spectrum in the past, and</p>

hope Ofcom will continue to show the same level of cooperation with the community in future, although clearly there are a number of criteria that influence the scope for sharing, that must be borne in mind. In addition PMSE has adapted to become increasingly spectrally efficient, with manufacturers making significant steps in this area. However BEIRG would like to stress this level of technological advance should not always be relied on. BEIRG would like to stress that squeezing the sector any more could seriously damage its ability to provide high quality content. PMSE has access to nearly 50% less spectrum than it did 10 years ago, and has had to adapt to continue to provide a high level of service to the ever-growing creative industries sector.

Content Creation

Technological progress has seen digital streaming services become a mainstay in the entertainment sector, and this has been accelerated by the Covid-19 pandemic. Both domestically and globally audiences are increasing - enabled by the digital revolution. UK Theatre audience numbers have grown by more than 10% per year for more than 10 years, with UK theatre ticket sales reaching 34million in 2018 (an 80% increase from 2014). In recent years streaming of live or recorded content to cinemas, other theatres and venues has created a new and developing audience that has grown even more quickly, especially during the pandemic. For example, during the 2020/21 lockdown The NT at Home screened 17 productions to over 170 countries, reaching 15m viewers.

With more and more production studios investing in the UK, this sector looks set to continue its upward growth, with Netflix, Disney and other key platforms announcing £50bn of investment. Content creation relies on spectrum in its production, whilst the content itself also needs somewhere to be streamed. The recent consultation on the Government's Wireless Infrastructure Strategy sought evidence on future efficient use of spectrum and whether the current regulatory frameworks for spectrum would be suitable to support new competitive models. The growth

of content creators alongside mobile networks' 5G rollout means that there will undoubtedly be more demand for spectrum in the UK. Whilst the PMSE community acknowledges the benefits that the growing creative sector brings, we would emphasise that accommodating these creators goes hand-in-hand with the production side and PMSE. The PMSE community and content creators could benefit from the release of additional spectrum, if it were to protect PMSE's current spectrum allowance. The community's expertise should be consulted on future strategies to ensure that all spectrum users are treated fairly.

The importance of DECT Technology to PMSE

One of the important factors that has enabled PMSE users to cope with the loss of so much UHF spectrum is the migration in recent years of certain former users of UHF (including 700MHz and 800MHz, but in reality from 470MHz upwards) to DECT technology. Whilst this technology is not suitable for all forms of audio PMSE use, many business and educational users, of wireless microphones, particularly further education are now able to use DECT based devices thereby freeing up previously occupied UHF 'slots'. Audio for video applications, ranging from YouTubers to main stream Broadcast Electronic News Gathering (ENG) are another area where DECT based wireless microphones are further reducing the burden on the UHF spectrum. Further Education in particular has been a substantial 'hidden' user of wireless microphones and the demand has been substantially increased by the recent trends in distance or hybrid learning and lecture capture. If these users were to migrate back to UHF technology, the additional burden on the available UHF spectrum would put considerable strain back on to the remaining available UHF resource which continues to be so vital to so much of the PMSE ecosystem.

Until quite recently, crew communications like Intercom or Talkback systems in live music, theatre and broadcast, corporate events and conferences, including political party events, were all utilising UHF spectrum, as there was really no alternative. However in the last few

years these have also now largely migrated to DECT technology, further easing pressure on the reduced quantity of available UHF spectrum.

So at a time when the traditional use for DECT might appear to be in decline (with the reduced use of landline phones and thereby, mainly domestic, cordless phones), the importance of this technology and its associated spectrum to PMSE has now increased enormously. We would urge Ofcom to strenuously resist any impressions or suggestions, domestically or internationally, that DECT technology and spectrum is just “granny phones” and can now be swept aside in favour of newer shinier technologies. The loss or erosion of the dedicated licence exempt DECT spectrum would be devastating to PMSE.

Security of tenure

BEIRG is grateful to Ofcom for identifying and opening up the 960-1154 MHz bands for PMSE use. However, the bands remain a UK-only solution, limiting their attractiveness to manufacturers and limiting the quantity and range of equipment that may be available for use in the bands.

The clearance of both the 800MHz and 700MHz bands has already caused significant disruption to the PMSE sector and despite Government financial support, it has negatively impacted the industry over the last 10 years. The industry practices have become even more spectrally efficient and technological developments have helped that too, BUT ensuring the sector has reasonable, protected access to sufficient quantity and quality of spectrum is of paramount importance, not only to the affected companies but to the entertainment industry and UK economy as a whole. Therefore, the PMSE sector is looking for some security of tenure and reassurance that this is not to be a 5-7 yearly cycle. We are concerned that there will be another clearance programme and the upheaval for those who provide content and support our creative industries cannot be over-stated. Another move would have a highly damaging impact on the PMSE community.

Conclusion

The PMSE sector faced a damaging loss of spectrum access as a result of the 700 MHz spectrum clearance, but has responded to the challenge to use the new allocation of spectrum as efficiently as possible, and have worked with Ofcom at all stages of the clearance programme.

However, it is crucially important that PMSE, now through the process of moving from 700 MHz and the associated disruption are given reassurances by Ofcom that their new 'home' will remain as such for a considerable period of time.

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 (including music festivals), 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.

As well as being vital in producing live content, wireless audio PMSE technologies play a key role in helping to improve security and safety levels within the entertainment industry and other sectors. Their benefits include improving the management of electrical safety, the reduction of noise levels, the development of safety in communications and reducing trip hazards as well as providing an essential tool for the security orientated services. Wireless equipment and the spectrum it operates in are now crucial to the British entertainment industry.

	<p>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.</p>
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¹<http://www.apwpt.org/>