

The Response of Motorola Ltd

to the

Consultation on the Digital Dividend: Clearing the 800MHz Band.

Motorola is grateful for the opportunity to contribute to the consultation on clearing of the 800MHz band.

As a manufacturer of communications products across a wide range of markets rather than either a licence holder or other incumbent within the band, we refrain from commenting on most of the consultation. However, we are keen to see the United Kingdom take the opportunity that is being presented by this consultation to initiate an investigation into the actual spectrum needs of the microphone services (as used by the PMSE community). This will permit spectrum managers to ensure that the right amount of spectrum is made available for PMSE use, leaving the remainder free to support the deployment of new services on a coordinated basis. We therefore constrain our response to question 1.

Question 1. Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?

Motorola agrees that the interests of citizens will be furthered considerably by measures to clear the channels 61, 62 and 69 to permit the deployment of important new services.

However, we do not agree that these three modifications further the interests of citizens to the greatest extent. To extend the benefit we propose an activity be undertaken that could enhance the interests of citizens significantly further. Motorola believes that clearing microphones from many other channels would greatly increase the benefit provided by new services to the UK citizenry.

We propose that since the utilisation of the UHF band by the PMSE community is under review as part of this consultation, we suggest that this would be an excellent time to extend the review to analyse the use of the entire UHF band by the PMSE community with a view to securing access to the number of channels they need to support their service rather than permitting access to the entire UHF band as today. By this means we expect that significantly more radio spectrum could come available to support new uses.

We note that microphones are rated as needing 200kHz of bandwidth for operation. Each TV channel is 8MHz wide, thus up to 40 microphones ought to be able to operate simultaneously on a single channel in the same location, given good equipment.

We further note that the report "Potential for more efficient spectrum use by wireless microphones" - CSMG, 4th Nov 2008, contains the information that digital microphones out-perform analogue ones in that they require a 20dB lesser RF signal to noise ratio to achieve the desired audio quality. This would appear to indicate they are 20dB more immune to interference thus permitting greater flexibility in the use of the band. We conclude that the move to digital technology should be encouraged wherever possible.

Questions and comments regarding this response should be addressed to T. Cull in the first instance

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