



AUTOGRAPH
SOUND RECORDING

Autograph Sound Recording Ltd's Response to the
PMSE use of the 700MHz guard band

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I am writing to present the views of Autograph Sound Recording Ltd in response to the consultation: '*PMSE use of the 700 MHz guard band.*'

Answers to Questions

Q1: Do you have any comments on our proposal to allow audio PMSE services to operate in the guard band from 694 to 703 MHz, and that this would be a benefit to PMSE users?

Autograph believes Ofcom should allow PMSE access to the guard band, even though its suitability is as yet not fully known. If it is available, it should be on a co-ordinated basis.

Autograph also agree with the following extracts from the BEIRG response
It is imperative that Ofcom decouples the 694 – 703 MHz guard band from the assessment of funding eligibility under Ofcom's PMSE support scheme. Most importantly, there is no guarantee that the guard band spectrum will be useable and it would be unfair to set funding criteria based on unknown quality spectrum.

Additionally, including the guard band in the calculation of funding eligibility as currently proposed would render a large amount of equipment ineligible which would previously have received funding. For example, the popular N-GB range of Sennheiser wireless microphones (606-790 MHz) currently have 52.2% of their tuning range in the 700 MHz band, but after the boundary is adjusted, that will fall to 47.3%. This is a huge problem because of the quantity of N-GB range equipment currently in use. More detail on BEIRG's position on this issue can be read in question 4 of our response to Ofcom's consultation on support for PMSE equipment owners.