



Alberto Fernandes
Ofcom
Spectrum Group
2a Riverside House
London
SE1 9HA

13 July 2017

Dear Alberto,

We write in response to Ofcom's consultation, 'Spectrum for audio PMSE: Proposed use of the 694 to 703 MHz band'.¹

We are grateful to Ofcom for recognising the problem that programme makers face in respect of reduced spectrum availability for wireless microphones as a result of 700 MHz and previous clearances and we appreciate this proposal to make additional spectrum available. The use of wireless microphones and auxiliary equipment such as in-ear monitors is crucial to the production of programming, music and sporting events. Without secure access to significant quantities of suitable spectrum to facilitate deployment of such equipment, the BBC's programme making functions could be disrupted risking the quality of our TV programming for audiences.

Proposal to make the guard band available to programme makers

As Ofcom will be aware, using spectrum so close in frequency to mobile operations would carry a high risk of interference for programme makers depending on the geography of mobile roll out. For audiences – especially for those watching live programmes – there is a risk of interference which could cause a disrupted viewing experience. For example, interference from mobile could cause loss or degradation of audio quality during a Glastonbury headliner.

We note that no professional PMSE operators are using the 800 MHz spectrum gap (below the LTE-800 UE band) for this reason, and the 9 MHz of spectrum below the LTE-700 is likely to have similar quality issues and risks for broadcasters. At the present time - that is before mobile operators have rolled out in 700 MHz – it is not possible to predict what the interference levels in this spectrum will be and where geographically spectrum will be usable.

Regretfully, we have therefore concluded that there are too many uncertainties over the guard band to consider it viable for professional, high-value PMSE applications. We would be willing to work with Ofcom to assess its viability in the future. However, the uncertainty (which will continue until mobile roll out has been completed) means that PMSE operators will need to replace equipment in this range in order to guarantee usable spectrum for programme making in the medium term. Therefore, equipment operating between 694 to 703 MHz should remain eligible for support through the PMSE scheme Ofcom is separately consulting on.²

¹ https://www.ofcom.org.uk/__data/assets/pdf_file/0016/100942/700-mhz-guard-band-pmse.pdf

² https://www.ofcom.org.uk/__data/assets/pdf_file/0021/100965/700mhz-band-pmse-funding.pdf

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Helen Charles', with a horizontal line underneath.

Helen Charles
Senior Policy Adviser

Cc: Daniel Wilson, Head of UK Policy, BBC
Vaughan John, Ofcom