



Response to Ofcom Consultation: Switchover-related Changes to DTT Licences

Background

JFMG Ltd manages the spectrum allocated for use in programme making, entertainment, special events and related activities. JFMG coordinates the use of spectrum, issues licences and collects licence fees on behalf of Ofcom. JFMG has successfully managed spectrum for Ofcom (previously Radiocommunications Agency) since 1997.

In the UK, the professional use of radio for programme making and entertainment purposes is referred to as Programme Making and Special Events (PMSE). PMSE applications include:-

- Broadcast television studio production
- Broadcast television and radio coverage of news, sport or other public events including state occasions
- Theatre and touring shows
- Music and other entertainment productions
- Conferences, and corporate presentations and events
- Movie film productions

Consultation Questions

JFMG has responded to the only question relevant to the management of PMSE in UHF broadcasting spectrum:

Question 2): *Are the proposed new provisions relating to cooperation and coordination with other parties concerning DSO, and contained in the annexes to the multiplex licences, necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

The programme making and entertainment industry is dependent on shared use of the UHF TV band. The primary requirement is for wireless microphones and similar equipment. Sharing is on the basis of interleaved use in the gaps (or so called “white space”) between individual broadcast transmitters.

JFMG coordinates individual frequency assignments for wireless microphones to ensure that domestic TV reception and re-broadcast links to TV relay stations are not subject to interference from programme makers. JFMG uses on-line and in-house geographic tools to facilitate coordination with broadcasting. The engine of these tools is a geographic database which is mainly derived from field strength predictions for the broadcast transmitters.

Although not mentioned specifically in the consultation document, JFMG will also need to be closely involved in the Digital Switchover project to ensure continued protection for digital TV broadcasts. The cooperation of broadcasters and multiplex licensees in making available field strength predictions is desirable. This would avoid the need for these to be duplicated by JFMG as a precursor to calculating the geographic data which represents the zones where wireless microphones cannot be safely used.



Summary

JFMG supports the proposal to include a requirement to cooperate with other parties in relation to DSO. Specifically, this should include JFMG Ltd (or other PMSE spectrum manager). Arguably, the text as drafted already covers this either in:

*Annex: Part 9, 17(a) "Other Ofcom licensees" or
Annex: Part 9, 17(d) "with such other parties, as necessary, or as notified to him
by Ofcom,"*

However, JFMG believes that the licensees may not be aware of this requirement and that it would be beneficial for it to be specifically referenced. Our proposal would be:

*Annex: Part 9, 17(a) "Other Ofcom licensees including secondary licensees engaging in
programme making, entertainment and related activities"*