

Public Consultation
on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023
Input to the consultation

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Introduction

Pearle*-Live Performance Europe, the European employers federation regrouping organisations and companies in the music, performing arts and live event sector, welcomes the consultation of the RSPG on its draft opinion on the ITU-WRC in 2023.

The sector employs over 1,6 million people and has more than 800,000 companies active across Europe.

This paper focuses on **Item 1.5 of the WRC Agenda, dealing with the UHF Band**.

Pearle* is part of the Wider Spectrum Group¹ which has a broad coalition in the broadcasting and PMSE sectors, including also consumers. The WSG responds regularly to EC and RSPG consultations. The WSG has also responded to this consultation. The contribution of Pearle* is intended to complement a number of the arguments set out in the WSG paper.

Members of Pearle* are end users of wireless microphone equipment, which they use on a daily basis in performances, concerts, shows, and other events, such as conferences or meetings taking place in their venues or at festivals. It concerns both indoor and outdoor use. It is therefore an important part of the PMSE group.

As end users our members have a direct interest to have access to well-functioning and reliable equipment for a substantial number of years to benefit in an optimal way of the investment they made when buying the equipment. Therefore the basic condition is to be able to rely on access to the spectrum on a permanent basis and with the highest assurance of audio quality.

The UHF band is the only band that meets all the conditions, provided PMSE can continue to share the band with broadcasting, where there is no problem of interference.

¹ <https://widerspectrum.org/>

Comments on the draft Opinion of the RSPG on the UHF in the frame of WRC23

Item 1.5 on the WRC agenda on a review of the UHF in Region 1 looks in particular at the 470-694 MHz (in accordance with Resolution 235 of WRC15).

1. The EU, as part of Region 1, has a unique place within this region as concerns media and cultural policy, which are embedded in and protected according to the European Treaty. Moreover the EU prioritises also the democratic values, rule of law, citizens participation and social cohesion, all of which media and culture are a crucial element to achieve those objectives.
2. The EU attaches also great importance to protecting citizens from fake news spread through social media channels and platforms. Public service media are therefore best places to provide objective news and information. This has been well illustrated during the Covid crisis. Almost more than any other, this is a strong argument to protect broadcasting and PMSE access to the UHF.
3. It is well noted that the EU has secured 1200 MHz for mobile services since 2014 in all Member States. The EU has therefore assured enough bandwidth to accommodate the technological developments for the years to come. On this basis it is now necessary for mobile services to increase efficiency when using the more 1000MHz made available.
4. Broadcasting and PMSE have efficiently shared spectrum for over decades and increased efficiency gains thanks to technological developments. For instance, PMSE has now much higher channel counts in reduced clear spectrum. It is a best practice example on spectrum sharing.

This is not the case for the mobile sector, which still hasn't been able to develop a model to make it possible to share spectrum with other services. This means that allocating a co-primary status to telco is technically not possible and would result in a de facto situation that terrestrial broadcasting & PMSE could no longer operate due to the interferences caused by mobile.

5. As technological efficiency is demonstrated by the broadcasting & PMSE, it also demonstrates to be a good practice of environmental sustainability, energy efficiency and circular economy. Wireless microphone technology in PMSE has a long lifespan. It is easily used up to 10-15 years in theatres. It is not only because it concerns a substantial investment, but also because the equipment is robust and trustworthy. Long before circular economy was promoted, EU wireless microphone equipment was re-used and got a second (or even third) life with amateur groups or by other end users.
6. The live performance sector has been heavily impacted by the Corona pandemic, with less than 75 to 90% turnover in 2020² due to the measures taken by public authorities that led to a reduction of activities. This means that the sector is currently in a process of recovery whilst still coping with the economic impact of the closure of or limited capacity at venues.

² EY study 'Rebuilding Europe : the cultural and creative economy before and after the Covid-crisis' – January 2021 <https://www.rebuilding-europe.eu/>

As the pandemic is not over yet, the sector is still operating in great uncertainty on possible measures in case of a new Covid-wave. In addition the sector will be heavily impacted in winter for the heating of venues due to the current energy crisis, following the invasion of Russia in Ukraine. Although those are impacting the near future, these two crisis situations obviously have repercussions for the following years.

The sector needs a stable regulatory environment in which it can work and continue to provide the best quality shows.

7. The 2014/641/EU³ Commission Implementing Decision on PMSE stated that cultural events have a daily spectrum need of 96 MHz. Over time events and shows have only become more spectacular and technologically complex, which in present days corresponds with a daily spectrum need of 110 MHz. The current available (remaining) spectrum 470-694 MHz must therefore be guaranteed. For major events the average of the required spectrum is even 174 MHz, while the peak demand could be the whole available UHF spectrum of 224 MHz.
8. Europe has probably the highest density of theatres and venues in the world, due to its immensely strong cultural sector. Even in parts of the world with strong cultural hubs (e.g. NY or Las Vegas in USA) or expanding markets (e.g. the growth of live music in the Gulf States⁴), it can therefore not be compared to other areas of the world, where the situation is different. It is crucial that the cultural offer in whatever city, town or village can be guaranteed. At all costs, situations should be avoided, that a performance is disrupted by the fact that a performance cannot take place. Or even in a worst case scenario that it is interrupted in the middle of the show due to a lack of available spectrum or due to interference. Already the audio technical crews must find solutions for spectrum shortages.

Conclusion

Based on the options presented in the consultation paper, the RSPG should recommend to the EC for its position to be one of “no change”, in line with the EU’s policy objectives.

As spectrum is scarce and a public good, regulators must ensure that all stakeholders and industries use the spectrum in the most efficient way. The wireless microphone equipment manufacturers have done so on a continuous basis the past years and the shared spectrum between broadcasting and PMSE is a best practice example in that context.

Culture and entertainment are drivers of economy in any part of the world and provide the content on which the mobile industry thrives. For Europe it’s also about the intrinsic value that culture embraces, through the social cohesion, the European values, the democratic access to culture and news.

Therefore, a position of “no change” should continue to be defended by the EU at the WRC23, beyond 2030.

³ 2014/641/EU: Commission Implementing Decision of 1 September 2014 on harmonised technical conditions of radio spectrum use by wireless audio programme making and special events equipment in the Union (notified under document C(2014) 6011) Text with EEA relevance

⁴ <https://www.iq-mag.net/2022/05/the-unstoppable-rise-of-the-gulf-states/>