

Comments on ECC Deliverable XXX(0X)XX
“Draft CEPT Technical conditions for the use of the bands
821-832 MHz and 1785-1805 MHz for
wireless radio microphones in the EU”

0 Sources

Administration/Company/Entity: British Entertainment Industry Radio Group
Name and Appointment of contributor: British Entertainment Industry Radio Group

1 General Comments

2 Proposals related to the ECC Deliverables

[**Note:** proponents are invited to use the following table to provide comments. It is also possible to provide as an annex the proposals with track changes and related justifications.]

Comment number	Section number/ Clause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change
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1	3.3.3		General	<p>BEIRG supports the move to develop a long term harmonised plan for PMSE spectrum access across Europe. Such a plan is long overdue. Further delays in providing this, combined with the upheaval in current PMSE spectrum access, are leading to even greater uncertainty in the PMSE sector as professionals put off buying new equipment and making long term business decisions.</p> <p>However, the harmonisation of the 821-832 MHz and 1785-1805 MHz should not be considered a solution to the serious spectrum deficit affecting PMSE. These bands offer an extremely limited quantity and quality of spectrum, and must not be viewed as an adequate replacement for the 800MHz, and potentially 700MHZ, bands from which PMSE access has been rescinded.</p>	
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2	3.3.1 and 3.3.2		<p>At each performance in London's West End there are around 1000 pieces of wireless PMSE equipment in use across all the venues. At the same time news crews and other content producers are also operating in this area, requiring further spectrum access. General daily production requirements require a minimum of 96 MHz with demand growing to in excess of 300 MHz for large and special events. These two bands will not provide an adequate replacement from these kinds of services.</p> <p>Furthermore, there is likely to be a high level of interference on any PMSE operations in 821-832 MHz and 1785-1805 MHz from LTE services in adjacent bands. If these bands are fit for any PMSE use, they will not be fit for the high-quality professional services which are required for content and high level entertainment production.</p> <p>Harmonised access to 821-832 MHz and 1785-1805 MHz is a welcome addition to the PMSE spectrum allocation. However, it must be regarded as an additional consumer band, and not a suitable allocation for professional services, nor as an adequate replacement for the 800 MHz, or 700M MHz, band.</p>	
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