

Representation on behalf of a Community User of Radio Microphones

I write as a member of Broxbourne Theatre Company, a non-profit organisation presenting pantomimes and musicals for the benefit of the local community in Hertfordshire.

A year ago, we bought a set of 8 radio microphones to enhance our performances.

This was intended to be a long term investment, and was carefully considered due to our non-profit status. We judged that the equipment if properly looked after could reasonably be expected to give service for at least 10 years, and based our decision accordingly. We studied the available frequencies, and consequently chose equipment capable of working on the standard UK “shared” UHF frequencies, which was – *and still is* – the only economical and legally licensable frequency set which is appropriate for our purpose.

It is therefore somewhat disconcerting to discover that the Government may substantially change the way in which those frequencies are allocated, and in particular the possibility that this might start happening as soon as 2006. Moreover it prevents us buying additional radio equipment that we currently need, because there is at present no satisfactory long term alternative.

Accordingly, I would like to:

- a) add further emphasis to the presence of existing legitimate users of radio microphones within the frequency range under discussion, a situation mentioned only very briefly in the consultation document, with as yet no apparent proposal for resolution
- b) explain that it is not just commercial organisations (eg professional theatres and sound equipment hire companies) that will be affected by any proposed change to the ability to license radio microphones
- c) request that the Government takes all possible steps to preserve the frequency range known as Channel 69 (from 855-863Mhz) or, at the very least, the specific “shared” frequencies on which we and the majority of similar UK organisations currently license, for as long as is reasonably practical, with an aim to keep them available to radio microphone users for at least 10 years after an alternative frequency band is released, and to be licensable at a cost not exceeding that of the current UK shared frequencies
- d) to recall the precedent that TV Channel 5 was released on condition that the new licensee bore the expense of fixing the equipment previously using that frequency (in that case, video recorders) so that they operated on an alternative frequency, and
- e) therefore to propose as an alternative, *in the event that it proves commercially desirable to reallocate Channel 69 less than 10 years from release of an alternative frequency band*, that the new Channel 69 licensee similarly be required to bear the time-proportioned costs of converting or replacing any

equipment hitherto legally using that frequency (ie, if the new licensee wishes to use the frequency after only 7 years overlap, he contributes 30% of the conversion/replacement cost) .

Preservation of Channel 69 frequencies is however only a partial solution, unless the intention is to preserve them for considerably more than the ten years currently suggested. In fact, ten years would only be sufficient if it begins from the latest of:

- the new frequency band being agreed
- equipment using those frequencies being generally available
- viable and economical licensing arrangements
- costs of the new equipment falling to that of the current equipment

in order that organisations can at all times in the coming years continue to buy equipment with the reasonable expectation of a 10 year service life.

It is also highly desirable that any *new* frequency be part of a common international allocation (which will provide economy of manufacturing scale, even if most of the individual users do not themselves operate internationally). For this reason, it is difficult to see how replacement frequencies can sensibly be considered before the mentioned international conferences of 2003-5. If it then takes 1 year to bring suitable equipment to market and a further year for that equipment to be economical, the earliest cut off date then becomes 2017.

In the meantime, it would be advantageous to study the possibility of more efficient and more effective methods of using the available spectrum. The Government and JFMG have together tried to do the best they could with the hotchpotch of frequencies hitherto available, but technology has improved substantially and current technology is not necessarily the technology that would give Best Value for the future.

Accordingly, I draw everybody's attention to the comparable existence of DECT. This apparently makes more efficient use of the radio spectrum allocated to cordless telephones.

I am only partially familiar with the technology concerned, but there seems at least a possibility that a new "Super-DECT" band could be considered, operating on similar principles but economically re-engineered to optimise it for high quality audio and to be licensable for the next generation of radio microphones. Perhaps such an arrangement could even be designed from the outset to support enough channels to meet the needs of towns such as London with multiple theatres in close proximity, without the present fear of interference or interaction and, therefore, without the need for specific co-ordination.

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