

Date: 10/5/21

Submission from



To

**Media Reform Green**

**Paper, Modernising  
Television Reform in Australia**

**The team at Totally Sound** thanks the Department of Infrastructure, Transport, Regional Development and Communications for the opportunity to respond to its Green Paper, Modernising Television Reform in Australia.

#### **Who are we?**

Totally Sound is a production business based in Bunbury, WA. We provide live sound, lighting, staging and AV for all manner of events throughout the Southwest and Great Southern regions. The business model also encompasses retail and commercial installation of audio-visual equipment.

#### **What impact will this proposal have on our business and our Industry?**

Our business is heavily reliant on wireless audio technology.

One of the negative impacts of the changes proposed in the Green Paper is that the spectrum available for PMSE (Programme Making and Special Events) systems will effectively be halved.

Wireless audio systems are at the start of the production chain, so they need to deliver the best possible quality with utmost reliability so that the quality can be maintained through the production chain through to the end user.

To deliver this performance the systems rely on continuous, predictable, clean, stable spectrum. They have this now in 520-694 MHz, operating under Classes 28 and 29 of the LIPD licence, sharing with the Broadcast TV stations.

The performance parameters that wireless audio systems demand cannot be delivered with other technology, not now and not in the timescale being considered in this Green Paper.

## **Here we go again!**

We have already been through this in 2014/15. The first Digital Dividend rendered all our wireless inventory useless. Expensive inventory housed in purpose built expensive road cases in beautiful condition. Equipment we had anticipated using for years. All worthless and useless. This cost our small business \$40,000.

This played out in businesses across the country. I suspect a large component of this equipment ended up in landfill as the added cost of sending it somewhere where it could be used was prohibitive.

## **The cost of replacement was significant and there was absolutely no acknowledgement or compensation for the impact/ costs incurred.**

We also have a retail and installation arm to the business. We have sold many wireless PA systems to our clients, specifically sporting clubs, churches, celebrants, agricultural clients, schools and funeral directors. This proposal will affect these small businesses and community groups. In a lot of cases the purchase of their PA system is one of their more significant costs, and they purchase it believing it will work for them for years to come.

It is generally not economically feasible for wireless audio systems to be modified to operate in a different frequency range, so those systems operating in the 600MHz band will become obsolete when the current legal uses of the 600MHz band change.

Our business would suffer significantly if the proposals in the Green Paper were implemented. We have a significant investment in wireless audio technology. Our investment was made based on the spectrum allocated to it in the Digital Dividend **just** 7 years ago. This equipment cannot be modified to suit the 500MHz band. The Green Paper proposal would make much of our investment worthless, **again**.

## **Further impact on a fragile industry**

We are part of an industry that is so very fragile right now. Covid has brought a great industry to it's knees. It is going to take years to recover. The industry is in no position to absorb yet another hit. Financial resources are low, the future of our market is uncertain for some time yet, and we don't have any certainty that the 500MHz spectrum will be available for long enough to make an investment viable.

I note with interest that there is little to no reference to any other users of the spectrum in question. As with the first Digital Dividend, our industry would simply be collateral damage. This time, with the industry seriously weakened, this proposal will fuel the decline, reduce business confidence and put jobs in the industry at further risk.

## **Summary:**

- Wireless audio systems are significant users of the 520 to 694MHz spectrum. Removing the 600MHz spectrum from wireless audio use will have a

significant negative impact on our business and indeed on the entire events industry.

- This is an industry that has already absorbed the impact of the First Dividend without any compensation.
- As the government would be well aware, the events and entertainment industry were one of the first industries to be affected by the pandemic and remain one of the industries who are yet to return to full capacity. This industry has had to 'take one for the team', to keep Australians safe. It is an industry that is mentally and financially exhausted. The last thing this industry needs in the coming years is further business disruption and financial burden.

**Should the proposed re-purposing of the 600MHz spectrum go ahead, we would be seeking support from the Government so that we could re-equip. We note the Green Paper proposes supporting the TV Broadcasters and some programme makers; in a similar vein, the wireless audio industry also needs to be fully supported.**

Planning to re-purpose the 600MHz band, especially in light of the relatively recent Digital Dividend (2014), demands that the needs of users and audiences of PMSE brought about by this re-purposing, are comprehensively addressed in a positive and co-operative way.

We would welcome an opportunity to actively participate in the consultative process around the planned changes.

Yours sincerely



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