



PRM

Profiles Resource Management

Submission: Media Reform Green Paper; Modernising television regulation in Australia (November 2020)

Profiles Resource Management

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Background

Profiles Resource Management (PRM) was established in 1997 to provide specialist services to the live event, sport, and broadcast industries. Our specialist area is spectrum management for those unique events and most of the devices under our management are used under the Radiocommunications (Low Interference Potential Devices) Class Licence 2015.

Since the first digital dividend was completed in 2014, spectrum management has become more important at high profile events and broadcasts as events have become larger, their complexity deepened and more wireless devices are in use, competing for a limited resource.

As a result of the demands placed on this industry by the first digital dividend manufacturers invested significant revenue to develop products that utilised digital technology and various spread spectrum techniques to gain spectrum efficiency. Even so, the majority of products developed for professional audio applications are still digital modulation or frequency modulation to achieve minimal or zero latency and operating in the 500/600MHz band for its superior propagation.

While our business specialises in spectrum management within the live event, sport and broadcast sector, our planning and preparation must account for other users nearby who are using wireless audio devices. These include, but are not limited to:-

- Other film and television providers located close by but not related to the current project
- Pubs, bars and other co-located hospitality venues
- Other high profile venues including theatres, conference venues and music studios
- Theme parks
- Places of worship
- Gym and fitness centres.

Devices used under this class licence are secondary users of the broadcast spectrum, however their current presence and ongoing use underpins the social and economic objectives outlined in this green paper. In a report commissioned by the Australian Music Association in 2008, it was estimated that wireless audio devices had a 10-year present value estimated benefit to the Australian economy in the range of \$291 - \$714 million¹. Based on our experience and anecdotal evidence, this impact may have increased at least three-fold since 2008 (COVID-19 notwithstanding).

Essentially their use is contributing to the economic growth the government desires however allowances need to be made for their use within any new framework that is proposed. The parameters of the current LIPD allow these devices to operate in Australia in “spare” parts of the spectrum outside television stations coverage areas, and in mid-band gaps. As less space becomes available in the 500/600MHz band, management of these devices in this space will become harder to achieve without

¹ “Untethering the microphone: An economic study of the benefits of spectrum use for unlicensed audio visual devices in Australia”, Windsor Place Consulting, 22 April 2008.

interference, making the other objective of increasing local content even more difficult to attain. (Wireless audio devices are used extensively in local content production.)

Consultation

As the scope of our experience is limited to secondary devices in the broadcast spectrum, our comments will be limited to those questions where our expertise will be valuable.

Chapter three; a new class of television broadcasting licence

3.3 *What elements of the existing regulatory framework should continue to apply?*

Allowances should continue to be made for secondary devices to operate fairly within the remaining broadcast spectrum as they currently do under the LIPD.

If, as the green paper alludes, 610-694MHz is repurposed to 5G mobile telecommunications, and existing television is condensed into 520-610MHz, there is a very real potential that there is little to no available spectrum for latency critical wireless audio devices (6 to 10mS total latency from mouth to ear is considered absolute maximum for a presenter or performer hearing themselves).

Whilst ensuring that sufficient spectrum is made available for Program Making and Special Events, we would also request that TV channel 27 (520-526MHz) is retained void and specifically purposed nationally for consumer level wireless audio devices.

Australian wireless audio users are reliant on our regulations responding to the same market drivers as those the major manufacturers are responding to. Very few wireless audio products are designed and manufactured in Australia. For this reason, it is important that any restack is aligned to other major markets so that we can access suitable products.

3.5 *When do you think the new licence framework should come into effect?*

A minimum period of 5-7 years should be allowed before the framework comes into effect. This would allow time for manufacturers to develop new products and for secondary users to transition equipment to a different part of the spectrum as the newer, more suitable products become available. A shorter period will adversely affect multiple users making relatively recent equipment acquisitions redundant and reasonably the shorter the time period, the greater the expectation of government financial support.

Chapter four: promoting the public interest derived from spectrum consolidation and reallocation

4.3 *How can the Government work with industry to minimise disruption for households during the proposed transition?*

Households are not the only stakeholders who will be disrupted by a spectrum consolidation and reallocation. Secondary users in the broadcast spectrum will also be disrupted and possibly have to purchase new equipment in order to continue deriving an income. PRM suggests that the government works with the relevant peak industry bodies (the Australian Music Association (AMA) and the



Australian Commercial and Entertainment Technologies Association (ACETA)) to develop a compensation package or tax incentive to purchase new equipment.

Chapter five: supporting broader media policy outcomes

5.1. Do you consider that revenue from the sale of spectrum could be used to support public policy initiatives for media?

Revenue from the sale of the spectrum should be used to support the public policy initiatives and compensate secondary users who may need to vacate the spectrum due to the proposed restack. Many of these wireless audio devices are used by Programme Making & Special Events (PMSE) companies in the production of broadcasting, news gathering, theatrical and concert content used by the media and Free to Air TV broadcasters to fulfill their Australian content obligations.