

Response to the consultation on the proposed changes of the Dutch National Frequency Plan, according the WRC'07 decisions

Herewith a response of the European Manufacturer Group, a European collaboration of manufacturers of Professional Wireless Microphone Systems (PWMS). The EMG members are: AKG (Austria), Audio Technica Europe (UK), Beyer Dynamic (Germany), Sennheiser (Germany) and Shure Europe (Germany).

We are deeply concerned about the position of users of PWMS in the Netherlands according the proposed changes of the National Frequency Plan, concerning agenda item 1.4aD.

The present status is that TV channel 63 (806-813) gives a national coverage for PWMS. Apart from this TV channels 64, 65, 66, 67 and 69 are being shared with DVB-T, however, regionally and locally heavily used by many PWMS. Exact market data are not available, but our industry estimates there are more than 100.000 PWMS being used on a daily basis by broadcast productions (as well as in studios as in ENG), the musical industry, conferences, concerts, churches, etc.

There is the main concern of possible interference of IMT services on PWMS and the result of PWMS becoming redundant with enormous implications on this market. In the design of the decision is no description found on these implications. To give primary status to IMT services suggests the worse for PWMS as secondary user.

Question 1: What will happen with TV channel 63 and are there possibilities for more TV channels within 470-862MHz that will give nationwide coverage for PWMS?

Question 2: What will be the compensation for PWMS becoming redundant as a result of the implementation of this intended decision?

Question 3: Is there a possibility to put back and/or adjust these proposed changes of the NFP?

The report on the Dutch participation of the WRC'07 raises some questions. Page 17, the 3rd paragraph says that there is a footnote according the UHF that the Netherlands already had an allocation for IMT services. Was this in the band 790-862MHz, knowing TV channel 63 was being used by PWMS? After all, in 2006 and 2007 Agentschap Telecom had consultations with the VPAD (Union of Professional Audio Distributors).

In this paragraph the protection of existing services, especially broadcast, is named. Does this include the production department (PWMS, wireless camera's, audio-links, In Ear Monitoring)?

In the commentary there is nothing to be found on the implications of this decision on PWMS in the Netherlands. It is our biggest concern the Ministry of Economic Affairs doesn't seem to recognize the importance of PWMS.

In the chapter of the Given Instructions to the Delegation on page 50, the Netherlands proposed a resolution which should have been accepted that calls for a severe study of the usage of the Digital Dividend. Herewith the EMG press the matter to have these compatibility studies being carried out "before" new services are being allocated. We offer all our support in this respect, within our abilities.

Besides the above, the EMG concludes, due to the larger offer of programs within DVB-T there is no Digital Dividend, but first of all a decline in available UHF spectrum.

In the chapter on the preparation of the WRC'11 in Lisbon, we would like to know the Dutch view on agenda item 1,5 on a worldwide harmonized band for ENG (1785-1805 MHz?), and on agenda item 1.17 on the further implications and planning of the IMT services in 790-862 MHz.

We would also like to know if there are possibilities for distributors and/or PWMS users to participate in the preparation of the WRC'11 and to become part of the Dutch delegation to the WRC'11.

Hoping for a good result for users of PWMS, sincerely yours: on behalf of the EMG, best regards.

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