UHF Radiomicrophones: Opportunities for future use



<u>Submission by</u> Hills SVL, June 24th, 2013.

Hills SVL welcomes the opportunity to contribute to the discussion document **UHF radio microphones opportunities for future use** because as an importer and wholesaler we want to ensure our customers have continued access to the radio microphone spectrum. We also want to ensure we get some surety around what frequencies will work the best.

However, Hills SVL is disappointed that RSM does not discuss in this document the spectrum that will be practically available for radio microphone usage from March 1st 2015. As per our current understanding of the current DTT allocations, in most cities there will be about 88MHz of usable spectrum where DTT is active. No allowance has been made for conversion of the remaining analogue licences held by Sky Network Television, which would be entitled up to 64MHz of spectrum for DTT use after digital switchover. Combined with the effects of in-fill transmitters, there may be as little as 16MHz white space for radio microphone or other white space usage in some geographical locations, in particular in Auckland. Until Sky Television Ltd's intentions are known, radio microphone users have no certainty as to what UHF spectrum will be available in the near future. Without any surety of the available spectrum it is near impossible for radio microphone suppliers or users to agree on what opportunities there are for future use or to educate its members on future use.

Internationally, spectrum available for radio microphone usage after DSO is also being considered for other white space usage. There is no discussion of alternative white space usage and its ramifications within this document.

Comment - Section 4:

Currently, most radio microphones operate within tuning bandwidths or blocks of between 24 and 50 MHz or approximately 3 to 6 New Zealand television channels. This is the limit of their flexibility to change frequencies. Within each block each radio microphone needs to be separated by approximately 1MHz.

Question one:

Radio microphones should be allowed to continue to use the 703-806 MHz block until 11th March 2015. Users need to be informed when possible interference from new rights users may occur.

Comment - Section 5:

Hills SVL supports the extension of the lower frequency limit of the radio microphone GUL to 510 MHz.

Comment - Section 5.3

Assuming the Maori Television Service Amendment Bill 2012 passes, would the new owners of the management right consider allowing the use of radio microphones under a general user licence? Has any consultation taken place on this matter?

Comment: Section 6:

Existing radio microphone users could continue to use the guard band if viable however it seems short-sighted to allow new users to the guard bands since there is no evidence that radio microphones can operate in the guard band without interference to them or from the other users.

Question two:

If continued use radio of radio microphones is to be permitted in the 698 - 703 MHz guard band it should be done on the basis of the existing GUL. A 10mW restriction will make the band only useful to users who are primarily purchasing low cost systems as professional users primarily operate systems from 30mW to 100mW.

Question three:

Should cellular transmission create emissions in the guard band, low power 10mW radio microphones are the most likely to be affected. It is useful to provide all or part of the guard band for radio microphone users but only at commonly used power levels.

At this stage, the problem of interference between radio microphones and cellular systems is unknown. Practical interference test should be undertaken before making a final decision on the use of the guard band.

Question four:

Hills SVL agrees that digital radio microphones should be allowed. Emissions modulation and emission bandwidths should be aligned with current European and American standards. The development of digital radio microphones has and will continue to use alternative modulation technologies. The GUL licenses should be flexible to allow operation of these new schemes without continual modification (of the GUL).

Question five:

Hills SVL knows of no other standards that should be listed in the radio communications radio standards notice 2010.

Comment: Section 9:

Comparisons with Australia raise several matters.

Having concluded its auction, radio microphone users in Australia know what spectrum is available for use from January 1, 2015. This is not the case in New Zealand. At least two of the major distributors of radio microphones in Australia have thus been able to utilise data for the benefit of the users

For examples see here:

http://www.frequencyfinder.com.au/

http://www.readyfordigital.com.au/

The RSM databases should be made more user friendly and accessible to the public similar to Australia.

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