

29<sup>th</sup> May 2020

## **Response to RSM Re-planning options for frequency bands within 1710-2300 MHz Discussion document**

**Pacific Audio Visual Ltd**, welcomes the opportunity to comment on the ***Re-planning options for frequency bands within 1710-2300 MHz Discussion document March 2020***

As an importer/wholesaler of radio mics, we have a keen interest in ensuring there is enough appropriate bandwidth available on commercially manufactured bands.

### **Pacific AV's response to related questions raised in the discussion document.**

Question 1: Do you agree with the RSM proposal to use the 1800 MHz duplex gap (1785-1805 MHz) for radio microphones? If not, what is a better use of this block of spectrum?

Accommodating radio microphones in the 1800 MHz duplex gap would suit the requirements of some users, not all, due to the likely limited transmitter output power, increased body absorption of the RF signal with bodypack transmitters and currently a lack of battery powered receivers. The current usage of 1800 MHz duplex gap for radio microphone systems is primarily semi-professional usage in education, conference and gymnasium fixed installations.

Both analogue and digital equipment is already available in other territories including our neighbour Australia

This would supplement other spectrum currently in use ensure that sufficient spectrum is available for all users, including those displaced by the previous clearance of the 700 MHz band in 2013. It is not considered as an option to any future use of portions of the 600 MHz band.”

Question 2: What size guard band would be appropriate for achieving compatibility between radio microphone use and mobile networks operating below 1785 MHz and above 1805 MHz?

This topic was studied in CEPT and suggests considering the protection parameters published in ECC Report 191<sup>1</sup>

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Question 3: *Do you agree with RSM's proposal to postpone a decision on the Unpaired 2000 MHz band (2100-2025 MHz) until there is clarity on international harmonised use for the band? If not, what is the best value use for this band?*

Pacific AV notes that in the ITU Region 1, 2100 - 2120MHz is heavily used for video PMSE live event coverage such as marathons, triathlons, WRC, yachting and cycling races. The European Commission has extended this to include 2010-2025MHz. We agree that until the *internationally harmonised* usage this band has been *fully agreed on*, *RSM's proposal to postpone a decision*.

*Question 6: Do you agree that the proposed channel plan for fixed links could also accommodate short term licences that may or may not align with the channel raster on a case-by-case basis and are subject to coordination with fixed links for TV outside broadcasts of major events and for space operation?*

Pacific AV notes in the ITU Region 1, 2200 - 2400 is also heavily used for video PMSE live event coverage

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<sup>1</sup> Adjacent band compatibility between MFCN and PMSE audio applications in the 1785-1805 MHz frequency range <https://www.ecodocdb.dk/document/298>

such as marathons, triathlons, WRC, yachting and cycling races. We agree that the Paired 2200 MHz band plan should also accommodate short term, licences for TV outside broadcasts or other PSME events in New Zealand.

Question 8: *Do you agree with RSM's proposal to reserve 2081.5-2110 MHz and 2256.5- 2290 MHz exclusively for space operation in New Zealand? If not, why not?*

Question 9: *Do you agree that the reserved spectrum would be adequate to support the growing demand in space activities?*

Question 10: *Is there a better use for the spectrum between 2081.5-2110 MHz and 2256.5- 2290 MHz? If so, what?*

Question 11: *Do you agree with the proposal to use 10 MHz guard bands in the frequency range 2290 2300 MHz?*

In addition to our answer to question 6, Pacific AV suggests that there should be flexibility within the entire 2200 - 2400 spectrum for the accommodation of short term licences for TV outside broadcasts or other PSME events in New Zealand.

Thank you for the opportunity to have input on this discussion document. We will continue to work with RSM to ensure access to sufficient spectrum for wireless users in education, entertainment, screen, sports and broadcast industries, which are vital to support the economy, society and culture of New Zealand.

We welcome Radio Spectrum Management to discuss any of the points raised in our response.

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