

Date: 10, May 2021

Submission

To

Media Reform Green Paper, Modernising Television Reform in Australia

We thank the Department of Infrastructure, Transport, Regional Development and Communications for the opportunity to respond to its Green Paper, Modernising Television Reform in Australia.

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.

Our business is heavily reliant on wireless audio technology.

We have 2 churches, located in different states. We run numerous services over the week, using anywhere from 20-25 wireless microphone every single week across the many and varied programs we host.

Typical applications for wireless audio systems include televised sport, music events, theatre productions, live music, television studio productions, film production and television news gathering. Wireless audio systems are also widely used at Universities (every lecture theatre in the country has at least one), schools, houses of worship, clubs, pubs, exhibitions and conferences; almost anywhere that sound needs to be captured. They are truly ubiquitous.

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 contiguous, 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.

The impact on our business

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.

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 has been severely impacted by the COVID 19 crisis, because we rely so much on the entertainment, events and sporting industries for revenue, and these activities have all been non-existent for the past 15 months. Even now, many of the 'normal' shows and performances are not happening because of the uncertainties that COVID brings. Our revenue sources are still quite small and very fragile.

The economics of re-equipping now make it impossible. 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.

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 supported.

The impact on the industry

Halving the spectrum available for wireless audio systems will significantly reduce the ability to deliver the quality of productions that we take for granted every day.

Consider an AFL game broadcast on TV. The broadcast rights for AFL are worth \$3.46 Billion dollars over 9 years to 2024. The AFL broadcast uses about 60 channels of wireless audio at every game to help deliver the premium viewer experience that drives this value. With only half the current spectrum, it would simply not be possible to operate 60 wireless microphones at a football venue so that premium experience can no longer be delivered.

And those 60 wireless audio systems at one game would have a value of about \$300,000. That is just at 1 game.

The same applies to Rugby League and to Cricket; the viewer experiences that we are used to today will not be possible to create. The level of investment in wireless audio systems at each of these games would be of a similar scale to the AFL.

International events, such as the various football world cups, netball world cup, possibly the Olympic Games in 2032, will have their broadcast capabilities strangled by what is proposed in this Green Paper.

The Broadcast industry, with all its myriad of delivery paths, relies on the audio that these wireless systems contribute to programme content. Without the current spectrum, it will no longer be able to provide the content that current productions require, much less the needs of future productions.

We seriously question whether there is any real need to repurpose all of the 600MHz band to 5G applications when there is so much spectrum already available for it, and new innovations are available to help make more efficient use of that spectrum.

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, on many other businesses, large and small, and make many of the live, broadcast and recorded productions that we take for granted today, and can imagine in the future, impossible to achieve.

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.