

Australian Wireless Audio Group

Response to the
*Spectrum Reallocation in the 700MHz Digital
Dividend Band - Discussion Paper*

Monday 6 December 2010



The Australian Wireless Audio Group (AWAG) is an Industry funded, non-partisan, representative group which speaks for key manufacturers, wholesalers, retailers and users of wireless audiovisual products currently operating in the 520-820MHz frequency band. We are led by the Australian Music Association who are the trade body for the music products industry, representing wholesalers, manufacturers, retailers and associated services for musical instruments, pro audio, print music, lighting and computer music products (please refer to www.australianmusic.asn.au). AWAG's members currently include:

- Jands Pty Ltd;
- Syntec;
- Technical Audio Group;
- Audio Products Group;
- Bosch Communications;
- Audio Telex; and
- Aerobic Microphones Australia (associate member, -representing fitness industry products).

We appreciate the opportunity afforded to AWAG in the “Spectrum Reallocation in the 700MHz Digital Dividend Band - Discussion Paper” (the discussion paper) to provide our comments on an issue which is critical for both our industry and the wide range of other sectors of the Australian economy which depend and utilise our products and technology.

Australian wireless users are currently operating in an uncertain environment – something which is delaying business investment and imposing considerable costs on our members and their clients. AWAG acknowledges the ACMA's specific recognition of the challenges facing the wireless audio community as a result of the current regulatory uncertainty. Early resolution of the issue will result in a more cost efficient solution for all parties.

AWAG's submission will offer direct responses to questions 1 and 2. The response will also comment on some issues for which the discussion paper does not provide questions in relation to Section 4.4 Timing Issues of the discussion paper.

Questions

1. Should the ACMA align its configuration of the digital dividend spectrum with the harmonised Region 3 arrangements?

AWAG contends that the alignment of the digital dividend spectrum with the harmonised Region 3 arrangements as adopted at the AWF meeting in September 2010 should be implemented by the ACMA. Harmonisation of the spectrum would provide a mid-band gap that could be utilised by a significant number of our stakeholders. This was proposed by AWAG in our submission to the Digital Dividend Green Paper in March 2010. To restate the argument:-

“AWAG supports this proposal and suggests that, assuming sufficient bandwidth (at least 8 MHz), this mid-band gap may be suitable to host some of the wireless audiovisual devices displaced by reallocation of digital dividend spectrum.

Pending further technical dialogue, AWAG suggests that, this mid-band gap may be suitable for the majority of entry level wireless audiovisual devices used by non-professional users, which represent around 56% of devices in operation (or an estimated 75,000 devices).

Generally, operators of entry (consumer) level devices require fewer systems per location, (a typical maximum of around four units per location), with smaller geographical reuse radius than professional devices, thus they are spectrally efficient. The 8 MHz mid band plan could support up to 8 users simultaneously.

AWAG considers that if given EXCLUSIVE access to sufficient bandwidth of nationally standardised spectrum, the majority of entry level (consumer) devices could be accommodated within the mid-band gap - spectrum which would otherwise most likely be underutilised.”

- (Australian Wireless Audio Group (AWAG) Submission in relation to:
Australian Government’s Digital Dividend Green Paper, 3 March 2010, p15)

Additional arrangements would need to be made for usage of these devices in the remaining broadcast services spectrum. These proposals were also outlined in the submission to the Digital Dividend Green Paper.

2. What are the benefits and risks of the ACMA’s preferred approach? Is there evidence to support the stated benefits or risks?

The size and location within the spectrum of the proposed mid-band gap will provide some fiscal and logistical advantages to AWAG’s users. While the exact location has not been determined AWAG’s own analysis indicates that over 80% of surveyed devices (see Appendix A) fall within the 700MHz band. Adoption of the Region 3 Harmonisation model and subsequent mid band gap proposal will reduce the number of users that will need to be migrated out of the digital dividend spectrum. This will also reduce the number of users that will need to be compensated for the forced migration. However, exact figures cannot be determined until some certainty of spectrum allocation is determined.

In addition the possible locations of the mid band gap will ensure that some harmonisation will remain for wireless audio devices with other countries worldwide. This will ensure manufacturers are able to maintain economies of scale and undue costs to users are not imposed as a result of the necessity of producing a uniquely Australian solution.

Section 4.4 Timing Issues

The Minister has stated on a number of occasions that the spectrum should be cleared as soon as possible after the switch off of analogue television which correlates with the “general preference from the telecommunications industry to utilise any spectrum they acquire as soon as possible after analogue switch off.” AWAG would like to reiterate:-

“the department should allow a minimum of two years for the withdrawal and migration of wireless audio users from the time it intends to allow the commencement of the new use of the 700MHz spectrum. This time would allow for the execution of an awareness campaign and the take back and resupply of alternately tuned devices. This assumes that there are no prolonged issues with manufacturers making the necessary changes in their manufacturing and supply chains. Therefore the sooner the Department offers some certainty as to the future operating frequencies of these devices, the sooner the migration can be executed.”

- (Australian Wireless Audio Group (AWAG) Submission in relation to:
Australian Government’s Digital Dividend Green Paper, 3 March 2010, p13)

Indeed, we cannot reiterate strongly enough the very long life-cycle of many wireless audio products, and the industry’s view that only a concerted and well planned campaign will actually enable the removal of these products from the market and a corresponding clearing of the digital dividend spectrum for other uses.



Wireless Audio Sales Data 03-09

AWAG Members

Update May 20
2009

Transmitter Freq	Estimated Sales F09	Units Sold FY08	Units sold FY07	Units sold FY06	Units sold FY05	Units sold FY04	Units sold FY03	Total Units
520-540MHz	2		4	36	6	0	0	48
540-560MHz	218	246	16	115	31	214	258	1098
560-580MHz			6	34	0	0	0	40
580-600MHz			0	0	136	164	184	484
600-620MHz	78	42	0	2	609	872	730	2333
620-640MHz	826	718	1629	711	1406	1277	992	7559
640-660MHz	749	863	6	3	7	13	9	1650
660-680MHz	490	631	8	8	28	12	8	1185
680-700MHz			8	4	5	9	13	39
700-720MHz	2749	3406	579	499	376	314	462	8385
720-740MHz	355	433	1343	1698	1210	255	254	5548
740-760MHz	1435	817	558	501	266	253	242	4072
760-780MHz	246	766	1478	909	918	1125	1158	6600
780-800MHz	4118	1473	2561	2865	2685	2798	1489	17989
800-820MHz	3086	3196	7325	5714	7937	9124	7695	44077
Total	14352	12591	15521	13099	15620	16430	13494	101107

Spectrum spread	
700-820Mhz units 03-07	87.09%
700-820Mhz units 03-09	85.72%



Contacts:

Ian Harvey
Executive Officer
Australian Music Association

MBE148/45 Glenferrie Rd
Malvern Vic 3144

(03) 9527 6658

Susan Twartz
Chairperson
Australian Wireless Audio Group

C/- Jands Pty Ltd
Locked Bag 15
Mascot NSW 1460

(02) 9582 0909