



**THE ASSOCIATION OF MOTION PICTURE SOUND**

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The Chairman  
The UK FILM COUNCIL  
10 Little Portland Street  
London W1W 7JG

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**RE: The Ofcom Digital Dividend Review (DDR)**

Dear Sir,

We urgently need to bring to your Council's attention a problem with the DDR that may severely affect film production here in the UK.

The Government, through their regulator Ofcom, are currently preparing to auction radio spectrum which will be released following Digital Television Switchover between now and 2012. Over the years, radio-microphones and other low-powered radio systems used by film and television sound recordists have co-existed within the analogue television broadcast band. In order to clear the spectrum for other uses, Ofcom are proposing to remove access to some of these frequencies. This cleared spectrum will then be sold by auction to the highest bidder. Since the mobile phone companies, amongst others, have a major commercial interest in available radio spectrum, they are expected to make some very large bids to secure it. We have no organisation within our industry capable of competing with the very large sums of money required in a free market auction.

After some steady lobbying by interested groups, a late proposal from Ofcom is that Channel 69, the band that the Film Industry uses most, would be reserved for radio-microphone use. As beneficial as this may appear, Ofcom add they want this particular part of the spectrum to be deregulated and unlicensed, allowing what they term 'Community Use'. This is very bad news for all professional users servicing film and television productions, who must have a quiet radio spectrum to operate their low powered radio-microphones, and who have individually invested many thousands of pounds in equipment. We fear that this band will fill up quickly with consumer products, increasing the prospect of interference and even making it unusable for professional purposes. At present, it would appear that no alternative is on offer by Ofcom.

The Association of Motion Picture Sound is a member of the British Entertainment Industry Radio Group (BEIRG - [www.beirg.org.uk](http://www.beirg.org.uk)) and it should be noted that not only will film and television be affected, but also theatre, music shows, sports and other events. For example, it is not yet clear what is going to happen about the London 2012 Olympics where estimates of 100s of channels being required far outstrip what might be available after the auction. We are actively trying to make Government aware of these issues and we have met with Ofcom on several occasions to make our case. We are currently working on a response to the DDR Consultation Document published by Ofcom just before last Christmas but there is no assurance that we can win our case for special status and to safeguard our frequencies by removing them from the auction process.

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We would like to see the Programme Making and Special Events sector, to which we belong, given, or perhaps rented at a nominal rate, quiet protected spectrum in which to continue to operate. We are particularly in favour of maintaining regulation and licensing of Channel 69 for professional radio-microphone and low-power radio use only, otherwise it will quickly become a free-for-all and a disaster for our industry.

As you are no doubt aware, sound recording for film production often relies heavily on the use of radio-microphones, and not only here. When our American colleagues come to the UK, they expect us to provide at least the same production facilities they have at home. If, through this folly, we lose our ability to reliably operate radio-microphones, our fear is that the Americans will simply go to another country which can offer these facilities, affecting the whole UK Film Industry.

We are asking for the support of the Film Council to maintain our capacity to service film production. We need our concerns made clear to Government. The wrong decision now will be irreversible - once the spectrum is sold, it has gone!

AMPS would be happy to meet with the Film Council if we can offer any further explanation of the situation.

Thank you for your attention.

Yours faithfully,

Sandy MacRae AMPS  
On behalf of the Council of AMPS