



c/- Sound Techniques
11A Violet St
Mt Albert
Auckland 1025

29th May 2020

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

Wireless Users New Zealand (WUNZ), on behalf of its members, welcomes the opportunity to comment on the ***Re-planning options for frequency bands within 1710-2300 MHz Discussion document March 2020***

Our membership consists of a cross section of suppliers, broadcasters, tertiary institutes, live sound engineers, film industry sound mixers and other radio microphone and in-ear monitor users.

WUNZ'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 current 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. The 1800MHz duplex gap cannot be considered as a replacement option for any future new usage of the 600MHz 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

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?*

WUNZ notes that in the ITU Region 1, 2100 - 2120MHz is heavily used for video PMSE live events coverage such as marathons, triathlons, WRC, yachting and cycling races. The European Commission

¹¹ Adjacent band compatibility between MFCN and PMSE audio applications in the 1785-1805 MHz frequency range
<https://www.ecodocdb.dk/document/298>

has extended this to include 2010-2025MHz. We agree with RSM's proposal to postpone a decision until the internationally harmonised usage of this band has been fully agreed on,

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?

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

In addition to our answer to question 6, WUNZ 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.

Thanks for consulting with WUNZ. WUNZ 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.

WUNZ welcomes Radio Spectrum Management to discuss any of the points raised in our response.

Address any enquiries to: Stephen Buckland,

Chair, Wireless Users New Zealand

Email: stephenb@soundtq.co.nz ph: 09 366 1750
11A Violet St, Mt Albert,
Auckland 1025