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Sennheiser's Response to TRAI's Consultation Paper on "Inputs for formulation of National Broadcasting Policy-2024"

April 30th, 2024

Shri Tejpal Singh
Advisor (B&CS)
Telecom Regulatory Authority of India

Dear Sir,

We sincerely appreciate TRAI for giving this opportunity to industry body to provide their responses to the above-mentioned TRAI's public consultation.

Sennheiser is a three generation, family run audio company with over 79 years of audio innovation and a pioneer in manufacturing premium class wired & wireless microphones and In-ear monitors.

At the outset, Sennheiser would like to provide its comments on Q.15 & point 2.154 mentioned in TRAI consultation paper.

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Q15. What policy and regulatory provisions would be required in the policy to enable and facilitate growth of digital terrestrial broadcasting in India. Stakeholders are requested to provide strategies for spectrum utilization, standards for terrestrial broadcasting, support required from the Government, timelines for implementation, changes to be brought in the current ecosystem and the international best practices. Please provide your comments with detailed justification and proper reasoning.

2.154 One of the primary pillars for terrestrial broadcasting would be the requirement of the spectrum. At present, the frequency band 526-582 MHz is being used by Prasar Bharati for providing Terrestrial TV Broadcasting. TRAI, in its 'Recommendations on Auction of Spectrum in frequency bands identified for IMT/5G' dated 11th April 2022, suggested that the DoT, in consultation with MIB, may explore the use of 5G terrestrial broadcast to replace MIB transmitters for efficient and effective use of the frequency range from 526-582 MHz.

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As per the above point mentioned in 2.154, frequency window from 526 to 582 is being used for terrestrial TV broadcasting by Prasar Bharti and is to be explored for the 5G terrestrial broadcast to replace MIB transmitters in this frequency range. We would like to draw your attention to this fact that the wireless microphones and In-ear monitors also work in this range. In fact, majority of wireless microphone manufacturing companies across the world manufacture the wireless products in the frequency range from 470 MHz to 698 MHz

Besides terrestrial TV, the wireless microphone & In-ear monitors also use the UHF range 470 MHz to 698 MHz since decades on co-existence basis in most European countries and other parts of the globe. Wireless Microphones & In-ear Monitors share the spectrum in this UHF range as the entire band is not occupied by the terrestrial TV. TV leaves enough gap for wireless microphone & In-ear monitors to be used within this spectrum.

We would further like to re-iterate that wireless microphones and in-ear monitors are extensively used in program making, broadcast news, live events, institutions, corporate meetings, politics, live debate, theatre, press-conference, sports, cultural events, state assemblies, parliament, army, house of worship, education, hospitals, touristic, etc.



Wireless applications in these areas are growing multifold today. Now-a-days, a standard production house or the sound rental company has about 60+ wireless links for its operation for which sufficient spectrum window is needed. Some twenty years ago no one could imagine that this would be the case and the demand is still growing. Wireless microphones and in-ear monitor systems demand sufficient spectrum to fulfill the expected operations of its users.

The needed chunk of spectrum for the use of wireless microphones and In-ear monitors is narrowing year by year post auction of bands like 700 MHz and above for various IMT application. If this continues below 600 MHz, the audio industry will face even higher challenges.

Observations:

All major countries allow Wireless Microphones license free with RF power up to 50mW (ETSI EN 300 422).

In India (region 3), UHF frequencies of regions 2, & 3 are allocated for broadcasting. However, the provision for co-existence of wireless microphones and In-ear monitors with low power output are still missing from the NFAP.

Request:

Worldwide, Wireless Microphones are manufactured and sold in the frequencies of 470 MHz to 694 MHz in UHF band, with restriction of 100mW or below and on non-interference and non-protection basis.

As the TRAI develops a National Broadcasting Policy, our humble request to TRAI is to kindly look into this spectrum need for the wireless microphone & In-ear monitors & consider our request to ensure that the wireless audio industry continues to get access to sufficient spectrum in UHF range 470 MHz to 698 MHz on co-existence and non-protection basis, which will enable the audio industry to support the events much needed for the cultural development of the country.

Please do not hesitate to contact the undersigned if you have any questions or comments.

For Sennheiser Electronics India Pvt Ltd



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