

PHD House, 4th Floor, Ramakrishna Dalmia Wing 4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016, Tel# 9599665859 E-mail: ajafri@mait.com 

Website: http://www.mait.com

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July 13, 2022

Shri K. Rajaraman, IAS Chairman, Digital Communications Commission & Secretary Department of Telecommunications

**Subject:** Recognition of Audio PMSE Industry as Spectrum Users and regularisation of usage in India.

Respected Sir,

Greetings from **MAIT**, India's apex body empowering IT, Telecom & Electronics Hardware Sector!

At the outset, we take this opportunity to appreciate your support to the Electronic and Telecom industry. We also thank the Ministry of Communications for extending deadlines for applicability of Phase 3 & 4 MTCTE regime by a year and MTCTE Certification validity from 5 Years to 10 Years. Both these are landmark steps and will contribute to the Ease of Doing Business in the country. MAIT reiterates its strong commitment to promote Telecom & Electronics industry and aligns itself with the Govt's vision on the growth of this sector in India.

## Background of the Issue

While the Ministry has been sensitive to Spectrum usage and allotment within the country, there is a constituency which is unrecognised and no regulations exist for them to use spectrum in India. This constituency is the Programme Making and Special Events (PMSE) industry. Our country regularly hosts major political, sports, cultural and business events at scale. Expos, Chintan Shivirs of political parties, their rallies, IPL events, Commonwealth games etc. all require a large number of wireless microphones and audio systems functioning in the UHF Band. The wireless feed is primarily divided into audio and video, and each has unique characteristics that needs to be catered for. PMSE is essential for social and cultural life viz. news gathering, theatrical productions, concert events, conferences and trade fairs and contributes with a high factor to the economy of every country.

## The existing challenge in India

While India has a very vibrant content creation industry with its film industry that includes Bollywood, its music, theatre and other sectors, OTT platforms are spending tens of billions of dollars on content creation globally, including a significant fraction of this money in India. Like all wireless communication technologies, the PMSE usage also requires spectrum to operate. PMSE uses spectrum in the 470-698 MHz range globally. ¹ Presently in India, there is no permission of any kind to the PMSE industry for usage of UHF spectrum. As a corollary, there is no recognition to the industry and its users.

## Formal recognition & permission

The Industry seeks formal recognition from DoT and permission to operate in the **470-698 MHz** range in India. Formal recognition and permission to operate is essential to prevent regulatory overhang and also to recognise a framework for their operation.

<sup>&</sup>lt;sup>1</sup> https://docdb.cept.org/download/3470

Apropos, to ensure the sustainability of the PMSE industry, we recommend the following for your kind consideration:

- Request for permission to access 470–612 MHz with RF power of 50mW or more for PMSE in India.
- Recognize the PMSE (audio, video, control) in the spectrum strategy plan, especially audio-PMSE in the 470-612 MHz range.

We sincerely hope that our request will be considered positively in line with the aspirations of the Industry. Should you need any further clarification, MAIT will be happy to connect with you and address the same.

Look forward to your continued support!

With regards,

Col Ali Akhtar Jafri, Retd

Dy. COO

(Acting Director General - MAIT)

CC: Shri V. Raghunandan, Secretary, TRAI

CC: Shri R K Saxena, Wireless Advisor, DoT