



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

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June 21, 2022

Shri V. Raghunandan  
Secretary  
Telecom Regulatory Authority of India (TRAI)

**Subject:** MAIT's recommendations on Audio PMSE requires access to sufficient amount of spectrum in the band 470 - 612 MHz

Respected Sir,

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

At the outset, we take this opportunity to appreciate DoT and TRAI for their extensive support to communication and telecom industry and also thank Ministry of Communications for extending Phase 3&4 MTCTE dates by a year. MAIT reiterates its strong commitment to promote telecom industry and aligns itself with the Govt's vision to develop a robust and secure state-of-the-art telecommunication network.

We are writing to apprise you about the issues faced by MAIT members who are stakeholders in Programme Making and Special Events (PMSE) industry. PMSE is the term used to describe the wireless communication links that allow the creative industries to transport the captured audio and video content from performers and presenters on location to audiences, either at the venue, at home, or increasingly, on the move. PMSE is primarily divided into audio and video, and each has unique characteristics that need to be catered for. **Audio** is of prime importance in the world of PMSE. Therefore, PMSE is essential for the social and cultural life and contributes with a high factor to the economy of every country.

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 communications technologies, audio PMSE needs spectrum. **PMSE uses spectrum in the 470-698 MHz range globally.**<sup>1</sup>

On 15<sup>th</sup> June 2022, the Government of India, through DoT, proposed to assign the right to use certain specified radio spectrum frequencies in which it has kept "612 MHz to 703 MHz" for 5G spectrum auctions.<sup>2</sup>

While it is vital to promote consumers' access to ultra-fast connectivity on mobile phones, the Govt should also cater to the needs of professional audio providers to create a level playing field for all stakeholders and enable a holistic ecosystem for the industry. As per industry's understanding, there is no interest and no ecosystem for 5G in the spectrum range below 600 MHz, however, range from 470-612 MHz is very important for PMSE.

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

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

<sup>2</sup> [https://dot.gov.in/sites/default/files/NIA\\_Version\\_Dated\\_15\\_06\\_2022.pdf](https://dot.gov.in/sites/default/files/NIA_Version_Dated_15_06_2022.pdf)

- 470–612 MHz with RF power of 50mW or more is opened (delicense) for PMSE in India.
- PMSE (audio, video, control) be considered in the spectrum strategy plan, especially in the 470-612 MHz range.

We sincerely hope that our request shall be considered positively in line with the aspirations of PMSE Industry, which is essential for the creative and cultural growth of the country.

Should you need any further clarification, MAIT will be happy to connect with you.

Look forward to your continued support.

With regards,

A handwritten signature in blue ink, appearing to read "George Paul", with a long horizontal stroke extending to the right.

George Paul  
CEO

CC: Shri K. Rajaraman, Chairman, Digital Communications Commission & Secretary, DoT

CC: Shri R K Saxena, Wireless Advisor, Department of Telecommunications