



Ms Neelie Kroes  
Vice-President of the European Commission  
Commissioner responsible for Digital Agenda  
Berlaymont  
1049 Brussels

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Dear Commissioner

I am writing to you on behalf of Pearle\*, the European trade federation for the live performance sector, in view of the upcoming proposal for adoption of the Radio Spectrum Policy Programme by the European Parliament and Council.

The live performance sector is highly labour-intensive sector, with an estimated employment of nearly 4 million people. Europe's strategy that focuses on jobs and growth has thus a significant meaning for us. As what we produce is 'made in Europe' we follow with great interest the proposals and initiatives formulated by the European Commission. The digital agenda is surely one of those areas where the sector sees challenges and opportunities, such as the offer of live performance as creative content online which is starting to develop as an additional market and as a way of communicating with consumers.

Given the importance of the first Radio Spectrum Policy Programme, that will provide the guiding principles for Member States on the radio spectrum allocation and more particular the digital dividend, we would like to address a few issues which we hope to be clarified in the proposal of the European Commission.

The live performance sector, that is a user of wireless microphones for performances, shows or events, and therefore relies on analogue radio spectrum, is directly affected by the decisions on this matter. Besides the on-stage event, the use of in-ear-monitors and of wireless microphones are also essential for safety reasons so that staff can communicate between back-stage and front-stage in order to ensure the safety of the performers on stage as well as of its audiences (including even their public protection). These communications run on the bandwidth 790-862 MHz, alongside other Programme Making and Special Event (PMSE) users. Digital frequencies are not an alternative as this results in a relay of a few seconds between the sender (a performer) and the receiver (the audience).

1

The fact that the sector relies on the 800 MHz spectrum makes it possible that equipment is available and operational all across Europe. Thanks to this economy of scale the purchase or rental of this equipment makes it relatively affordable for a sector that is characterised by thousands of SMEs including profit and non-profit distributing enterprises.

In addition, the available 800 MHz is important from an internal market perspective, as service suppliers of touring productions and shows want to be assured that the performance can take place under the highest possible standards of auditive quality for their public.

As you have stressed at several occasions the past months, the RSPP which will set out the main objectives and principles for Member States and the EU to follow should result in a win-win situation for all.

In this regard we would like to underline the importance of a coordinated approach at EU level, in the interest of all Member States. The implications for the sector –in the worst case scenario- may be huge, resulting in less diverse culture offer affecting both the bigger and smaller players in the market and an increasing higher price for tickets payable by the public. Coordination between the Member States is therefore of the utmost importance in particular in terms of efficient use taking into consideration that interference must be avoided at all costs.

This is equally important at international level, where this may affect services such as for the live performance for the Member States on the borders of the EU. International coordination is further also important on a global level, as live performance productions do not only tour to other parts of the world, but Europe is equally an attractive area for foreign tours and shows.

Concretely, in view of the adoption of the RSPP, the live performance sector asks the European Commission to provide clarity and certainty:

- on the available spectrum
- that spectrum will be coordinated in such way that manufacturers can supply equipment for the different spectrum ranges
- that the available equipment is not crippling the necessary available frequency ranges for a live production and for communication between staff (back and front stage)
- that the sector can access available frequencies at a price it can afford

We are convinced that with a coordinated approach at EU level and a voluntary collaboration between Member States a cultural diverse offer can continue to be guaranteed.

I thank you, on behalf of the members of Pearle\*, for your interest and remain available for any further questions.

Yours sincerely



Sture Carlsson  
President

Copy of this letter to Commissioner Androulla Vassiliou