

Title:

Mr

Forename:

Andrew

Surname:

Back

Name and title under which you would like this response to appear:

Andrew Back

Representing:

Self

Organisation (if applicable):

N/A

Email:

N/A

What do you want Ofcom to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: This executive summary sets out Ofcom's proposals for the release of the digital dividend. Do you agree with these proposals?..:

No.

Whilst it appears that sincere efforts have been made to improve on previous procedure and policy relating to spectrum allocation, it would seem that the proposals continue to serve the interests of commercial service providers. I really don't see how the proposals will truly serve the best interests of the public.

Furthermore the idea of allocating additional spectrum for the purposes of TV broadcast or similar, in a 'stove pipe' fashion seems extremely short sighted. It is only a matter of time before all such services are delivered via the Internet. There is the issue of mobile access, but we have 3G, and WiFi. And as for 3G look at the net result of those license auctions: poor and patchy service for the consumer and crippling costs for the service providers. Although I suppose the auction did raise revenue for the state...

Question 2: Do you have any comments on our analysis of the essential constraints that will apply to the available UHF spectrum?..:

No.

Question 3: Do you agree with the more detailed analysis and proposals regarding these technical constraints as set out in Annex 10?..:

I have no issue with restraints imposed as a result of adjacent spectrum users etc.

Question 4: Do you have any comments on Ofcom's assessment of the potential uses of this spectrum? Are there any potential uses which should be considered that are not mentioned in this document?..:

1. The technology underpinning the Internet has become the defacto technology on which all new communications systems are built. It is my opinion that this spectrum should be utilised in moving towards ubiquitous Internet access, and that traditional broadcast systems are increasingly of little value in this age.

2. In an age where content creation has been pushed to the edges thanks to the likes of blogging, Myspace and so on, i.e. the phenomenon termed 'Web 2.0', why on earth are we looking to waste spectrum on traditional and outmoded top-down communications infrastructure?

It is my opinion that the spectrum should be used to push network creation to the edges. It should be used to enable ad-hoc user created networks (e.g. employing mesh technology). Networks which are self-forming, self-healing, sustainable, and most importantly managed by the users (of course operating under license/guidance and in co-operation with other spectrum users). This may not have been possible a little while ago, but with modern radio and network technology it now is, and would be further aided by ongoing developments in software defined radio and cognitive radio.

Question 5: Do you have any comments on our analysis of the choice between a market-led and an interventionist approach to the release of this spectrum? Do you agree with the analysis of different mechanisms for intervening to remedy potential market failures?..:

Market-led strikes me as a terrible idea. We need genuine public services, for the public. And not to be told what we need by another profit driven organisation.

Question 6: Do you agree with our proposals to continue making available channel 69 for use by low power PMSE devices? Do you agree with our proposal to make some or all of the spectrum available for use on a licence-exempt basis?..:

Yes

Question 7: Do you agree that there should be transitional protection for professional PMSE users to ensure that they can continue to access interleaved capacity until at least the end of 2012? Do you have any views on the mechanism for providing future access to this spectrum?..:

Yes

Question 8: Do you consider that additional spectrum from the digital dividend should be reserved for low power applications? If so, please provide as much evidence as possible about the nature of the application and its potential value to society.:

Yes.

I believe that spectrum should be available to, communities, artists and experimenters, for use in creative applications. There should be sub-allocations for different transmissions modes and purposes. At the moment, we - the public, have very little, save for:

- WiFi (and at that a measly 100mW EIRP on ISM, compared to 1W in the USA)
- 27MHz Citizens Band Radio (a relic - should be reviewed to support data services)
- Other less flexible unlicensed bands with v.low power ratings, such as used by DECT, model radio control etc.

Oh, we did have a 934MHz Citizens Band, until you took that away and gave us nothing back in return.

Question 9: Do you consider that it would be desirable to hold back some spectrum from award with a view to its potential use for future innovation? If so, please provide comments on how much spectrum should be held back, and for how long.:

It would seem wise and would suggest that further consultation combined with research into new technology and applications may be the answer. As for how much, ~25%? It is hard to say for how long - perhaps a 5 year period given how difficult it would be to change allocation at a later date.

Question 10: Do you agree with our proposal that we should package the interleaved spectrum in a way that would be suitable for use by local television services, but not reserve spectrum solely for this use?..:

No. The days of terrestrial TV broadcast are numbered, why invest in a dead end.

Question 11: Do you agree with our proposal to package the spectrum in a way which does not preclude mobile broadband use, but to take no further action in relation to this use?..:

This would seem fine assuming such packaging would not lead to commercial mobile broadband being a preferred use.

Question 12: Do you agree with our proposal that we should not intervene in the award of this spectrum to reserve spectrum for DTT? Do you agree that we should package the spectrum in a way which is suitable for DTT use?..:

Don't give any more spectrum to DTT, please.

Question 13: Do you consider that we have included in our analysis the most material risks in relation to market failure?..:

Question 14: Do you agree with our proposal to auction licences for the use of the available UHF spectrum?..:

No!

Question 15: Do you agree with Ofcom's proposals as to the timing of any auction? If not, what alternative proposal would you make and why, and what evidence and analysis can you provide in support of your alternative proposal?..:

No. There is never a good time for such an auction!

Question 16: Do you have any views on which of the packaging options identified for the cleared spectrum would be most suitable?..:

Question 17: Do you have any views on which of the packaging options identified for the interleaved spectrum would be most suitable?..:

Question 18:Do you have any views on which of the auction design options would be most suitable?..

Question 19:Do you agree with Ofcom?s proposals for the non-technical terms of the licences to be awarded for use of the UHF spectrum?..

Question 20:Do you agree with the analysis of the options as set out in this Impact Assessment?..

Additional comments: