

I'd like to dispute Ofcom's conclusions in their "Digital Dividend Review". In my opinion, the conclusions themselves are short sighted, lack vision, and are not in the interests of the general public. The suspicion exists in my mind, and I'm sure in those of many other members of the general public who take an interesting in these matters, that the objective of the regulator is to obtain as much money as possible from selling off the spectrum by auctioning it off to the highest bidder, and that the government will seek to evade all responsibility, by claiming the the decision wasn't their's, and that it was instead made by the regulator. It would be outrageous in my opinion if this were allowed to happen, and no doubt the credibility of the regulator and the popularity of the government would be damaged in the years ahead, when the full ramification of the decision is finally understood by most members of the public.

1. That the 'market' can best decide the most valuable and efficient uses for the spectrum.

This is clearly not the case. If this decision is left to the market, the spectrum will be purchased by the company or organisation with the deepest pockets, rather than being used in the way that can most benefit the general public. Spectrum is a limited resource, and decisions about how it is used should be made in a way which is accountable to the people through it's elected government, rather than dictated by the interests of big businesses like the mobile phone companies or Rupert Murdoch's media empire. Public Service Broadcasters or even many commercial broadcasters cannot afford to compete with the amount of money these companies are likely to be able to bid. It seems likely to me that the spectrum would be put to other uses rather than HD television. The result being that in the future years the elderly and disadvantaged will become second class citizens because they will not be able to benefit from this advance in technology without a subscription which they can ill afford.

2. That little demand exists for HD television services on DTT (Freeview).

This is like stating that little demand existed for colour television in the 1960's. Few people have seen HD, and there are many who probably don't yet understand it's benefits. However progress is inevitable especially as far as technology is concerned, and in the same way that colour television became ubiquitous so will HD. We'd be in a very sorry state indeed, if most terrestrial television were still in black and white because the bandwidth had been auctioned off to others. It would be a very poor situation indeed, if you had to be able to afford satellite or cable in order to get all of your TV channels in colour. The public would rightly be critical, if they felt that in order to watch all of the BBC channels in colour, not only do they need to pay a license fee but they also need to buy a subscription from Virgin or Sky. We are in grave danger of being placed in the same situation with HD. By selling off bandwidth, even with advances in technology we are likely to be left with only a very small number of terrestrial channels that are in HD. Probably not enough channels to replicate the existing 5 terrestrial channels, and certainly enough to replicate the existing channels on Freeview. Free view has already proven to be very popular amongst large number of consumers who wish to have digital TV, but not wish to pay a subscription.

3. That HD television services have low social value.

This is a shortsighted and untrue statement. Forcing people to buy satellite or cable subscriptions to watch HD will create social division. Whilst HD can be considered a luxury today, so was colour when it was first introduced. The price of HD TVs will drop significantly and they will become the standard, in the same way as as happened with colour TV and just about every other item of consumer electronics. We would have significantly more social division now, if poor families or the elderly who couldn't afford subscription TV had to watch most programmes in black and white. Indeed if this were the case today there would be an outcry.

4. That facilitating HD television services on the DTT platform merits no intervention.

This statement is erroneous and incorrect. Without intervention to ensure that HD is supplied on DTT, the spectrum may well be put to other uses. Free to air television is the use which will benefit the most people, especially at the lower end of the income scale. In the future HD will be much cheaper and become the norm rather than an expensive luxury. Failure to recognise this ignores all of the trends seen in consumer electronics over the past fifty years.