

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

This is a very complex subject. My concerns are with the protection of PMSE use. I have responded to questions 6 & 7.

For the other questions I support the experts within JFMG Ltd, the BEIRG group, the Institute of Broadcast Sound (IBS) and the Association of Motion Picture Sound (AMPS).

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

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

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?..:

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?..:

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?..:

I agree with your proposal to make channel 69 available for use by low power PMSE devices.

I am one of many sole trader professional users of this channel. We work all over the country. We cannot afford to have different equipment for use in different parts of the country.

A single professional quality Radio Microphone channel costs around £2000 - 2500.

A professional Radio Microphone system can usually span 3, sometimes 4 channels eg the equipment can tune to frequencies in channels 67, 68 and 69. Equipment designed for these channels will not be able to tune to, say, Channel 38. The manufacturer may be able to retune the unit - but at a price. I have just had to have two vhf radio microphone units retuned away from 216MHz because Ofcom has removed this channel from PMSE use. It has cost me £675. In a climate where rates of pay are the same as 2000 I cannot afford to do this for all my channel 69 equipment.

I do not agree that this spectrum should become licence exempt. The spectrum is

useless for PMSE use if we cannot use it with confidence that it is going to be relatively interference free (interview with Prime Minister interrupted by next door aerobics class, Pride and Prejudice filming drowned out by Baby listeners...).

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?..:

Just as you make out in your consultation document that this UHF spectrum is an ideal compromise of Range over Data Capacity so too it is ideal for PMSE use because of its compromise of Range over reasonable sized devices (eg aerials) and power efficiency.

I agree that there needs to be protection for PMSE users. This protection needs to extend beyond 2012. Sole traders cannot afford to re-equip every few years. See Answer 6 above.

Without economic access to PMSE spectrum it will be very difficult to make the content that any potential purchasers of Cleared Spectrum may wish to beam down to their customers.

Use of interleaved spectrum will need to be administered by one body. Nobody know this complex business better than JFMG Ltd. Their contract should be extended beyond 2008.

Currently my licence fees to Ofcom are swallowed up in my business costs. Any increase will have to be passed on to production companies (BBC, ITV, Independents) as a levy on my charges. This may mean that I lose out on work to someone working without a licence. With such unregulated use we will then, effectively, have spectrum anarchy which is no good for licensed users of the spectrum whether they are PMSE users or paying users of adjoining White Space.

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.:

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.:

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?..:

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?..:

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?..:

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?..:

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?..:

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: