

**Title:**

Mr

**Forename:**

**Surname:**

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

Pip

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep name/contact details/job title 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. There is a major flaw in the assumption that HD television is not "a major source of broader value to society." That sort of base level consideration before going any further into consideration is akin to saying there was not value to shifting broadcasts to colour. It's just an erroneous assumption easily discredited by the number of HD TVs currently being sold and the eagerness of Sky to become an HD provider,

something they would only do if it was a commercial proposition which was in demand.

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

Again, things go back to an original premise that a "bigger choice of channels was rated more highly, for both citizen and consumer interests". Certainly not the case that more is better, a major flaw in the original allocation of digital TV as it disallowed the use of HD and high-quality sound

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

That has not been examined closely since, as stated, it is based on a false premise.

**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?::**

Certainly: there are currently constraints imposed by the bandwidth taken up by DTT. Should the obvious option be taken of providing the same capacity as DTT but for HD services, then eventually the current DTT spectrum could be freed up for other uses, in another analogy to the colour/BW switchover.

**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?::**

These sorts of market-led thinking are what make life for the BBC difficult. It is an exemplary model of what can happen if there is a non-market led approach, where a particular company can't suddenly "buy" the news.

The market-led approach is wonderful in the right place, but here we have the option of improving things by putting in the HD option, something everyone will appreciate since they will nearly all have HD TVs by the time of the switchover, instead of just diluting the enjoyment by having more, inferior products. Quality is what is meant to be provided by such things as the BBC. It doesn't always succeed, but it and its competitors should be given the opportunity.

**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?::**

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**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?..**

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**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.:**

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**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.:**

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**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?..**

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**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?..**

Yes

**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?..**

Definitely not: This should be a way to move DTT on to HD, just as we are currently moving from analogue to digital.

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

No.

**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?..:**

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

Decidedly not as it is based on a false premis.

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

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

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**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?..:**

No.

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

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**Additional comments:**