

Title:

Dr

Forename:

Robert

Surname:

Tidey

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

Robert Tidey

Representing:

Self

Organisation (if applicable):

Email:

N/A

What do you want Ofcom to keep confidential?:

Keep nothing 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. The phrase 'digital dividend' itself emphasises that the heart of the proposals is to maximise cost benefits rather than consider quality issues.

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

The analysis here is OK, but does not really take into account future improvements in coding techniques which in turn can lead to significant improvements in spectrum utilisation. Transitions to new coding methods are always tricky but can be achieved over time. For example if MPEG-4 and future advances became popular due to availability of TV Channels utilising this then over time it may be possible to transition some existing services over with spectrum benefit. The counter argument is that one can't do that due to the installed base has not prevented considerable fluidity in the Freeview channel line up and providing one maintains compatibility for access to the primary channels.

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

The overall treatment is thorough but there is a sparse treatment of the usage of SFN to improve the spectrum efficiency of the DVB-T system.

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?::

HDTV is of course mentioned but almost immediately ruled out. This is one of my main problems with the overall document. HDTV is presented as a premium service appealing to subscribers who are going to pay the premium rather than as the next step in the evolution of television. HDTV, if successful, should just become TV with only people present at the transition remembering the marketing of HD. There can still be a place for lower quality services to allow efficient spectrum usage. Previous advances in TV quality were not singled out in the way presented here as 'premium'. I understand that it is not possible to have a large range of quality services needing high bit rates in a terrestrial system, but this is not stopping other countries offering at least the primary channels at higher quality. The statements about HD potentially remaining a minority interest I find very strange. In previous transitions the technology was led by the providers. Here we could get into a position where most consumers end up with HD Ready equipment and little or no public access service supporting that.

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?::

There has to be the right compromise between a market led and interventionist approach. Intervention should be primarily controlling standards and primary usage allocation. Market led should primarily be used to control commercial access to the

usage. Even today there is not sufficient emphasis on standards. For example, many DVB-T channels are using parameters that lead to technical quality significantly inferior to analogue distribution. There should at least be a baseline for primary channels. There is an over-emphasis of quantity over quality.

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.:

No. As the proposal itself argues the value of this part of the spectrum is the medium range coverage it can give to support regional applications.

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.:

No. There should be more emphasis on ensuring and encouraging standards that make receiver design sufficiently flexible and agile with respect to coding and frequency allocation. This would then allow future innovation to be feasible to introduce into an installed base and free up spectrum usage if applicable.

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. I don't support the use of this spectrum for local television services. I believe this type of service could be supported by either other parts of the spectrum or by developments in IPTV. For example, feeds into local exchanges could provide economical distribution without incurring long haul telecoms costs.

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?..

No.

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?..

The spectrum should be packaged and reserved for DTT use.

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

No comment.

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

Not if it is just auction for spectrum without usage constraints.

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 comment

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

No comment

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

No comment

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

No comment

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 comment

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

No comment

Additional comments: