

Title:

Mr

Forename:

Arshad

Surname:

Rasul

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

S4C

Representing:

Organisation

Organisation (if applicable):

S4C

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:

Yes

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

Whilst we understand the logic and rationale of the consultation on the dividend review we feel there are two areas that should be given special consideration.

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?..:

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?..:

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?::

High Definition

There is definitely a large demand for high definition from the public. This is clearly shown by the growth in sales of HD ready displays and the take up of the currently limited HD service on Satellite. In future, HD DVD's and HD home camcorders will become the norm. The public will therefore ultimately be able to compare this type of quality against the broadcast offering. At present due to scarcity of spectrum, DTT is unable to support HD. Furthermore, unless UHF spectrum is allocated for HD, then it will remain as the only major broadcast platform unable to deliver HD in a meaningful form.

S4C would therefore support the argument for allocating spectrum out of the digital dividend for HD transmission. Unfortunately it is clear that the spectrum available will not be enough to satisfy all the broadcaster's needs. Therefore we propose that the HD mux(s) be classified as a pooled resource. The concept being that this resource is shared between all broadcasters. This would have the benefit of allowing all broadcasters access to the HD mux(s) and for all of them to be able to share the cost of the transmission service on the basis of hours used.

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?::

Interleaved Spectrum in Wales Urban Valley areas

Whilst we agree with the auctioning of interleaved spectrum is a valuable resource

that can be fully utilised, we feel that Wales has another valid call on this resource.

Due to the challenging terrain over large parts of Wales it is a difficult area to cover adequately with terrestrial transmitters. After DSO we believe there will be many small localised areas in Wales that will be unable to receive DTT. Experience would suggest that the number of such areas will be much greater than in other equivalent (by area) parts of the UK. Any particularly deserving areas by way of population density, could make use of the interleaved spectrum locally to reintroduce coverage that was either missing originally, or has been lost at DSO. A detailed analysis would ascertain where such holes in coverage will be likely to occur. In some cases this may only be truly apparent after DSO in the region is complete.

We would ask that Ofcom carry out such analysis to highlight such areas with a view to reserving the interleaved spectrum from auction in that locality for a period of time.

With a view to releasing it for auction only when DTT coverage has been proven to be complete in the locality.

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: