

## Consultation titled “The Digital Dividend Spectrum”

The assessment produced by OFCOM whilst most comprehensive, is however very short sighted or misguided. It's very difficult to predict how technology will develop, but the solution suggested by OFCOM of letting the market forces make the decisions is an abdication of Ofcom's responsibilities. It's like suggesting that commercial forces should decide the future of town and country planning development.

I believe that OFCOM or some other public authority must retain and regulate the terrestrial UHF TV spectrum, especially when there already has been substantial public investment in the Freeview services using the BBC licence fee.

Freeview cannot compete with the multichannel market of satellite or cable, nor in my opinion should it even attempt to do this. All the terrestrial analogue spectrum released on DSO will be needed to implement a public HD service on Freeview. BBC1, BBC2, ITV, Channel 4 and C5 should be expected to provide this service. A decision must be confirmed soon, so that the design of HD set top boxes can be started. In 10 years time High Definition will be accepted as the normal TV standard, and a Freeview service without HD will wither and die.

Your conclusion about the uptake of HDTV is flawed and probably reflects out-of-date research. Look at the facts:- The BBC are to produce all programmes as HD by 2010. The TV industry has announced that 'HDTV ready' TV sales topped 2.5m in 2006, and a further 4.3m sales are predicted for this year. A visit around any electrical retail store shows that 90% of TV's on display are marked as 'HDTV ready'. The TV licence paying public are going to be very annoyed and will feel cheated if HD is not available from Freeview at DSO; they will be asking who is responsible for this error of judgement?

There is mention in the proposal about changing the coding of the SD channels on Freeview from MPEG-2 to MPEG-4, this would be an expensive and stupid mistake at this stage of Freeview development, especially as the SD format is likely to become an obsolete standard in the near future.

The suggestion that a large number of the public favour multi channel on Freeview rather than HD seems to be contrary to your comments in A8.363/372 of the Digital Dividend Review Annexes. Most people I have questioned say that many of the additional channels on freeview are rubbish and a total waste of time, when all they wanted were a few additional quality channels. Freeview presently has a mishmash of service providers which shows how market forces can lead to inefficient use of the limited public resources. Perhaps this provided a welcome cash inject to make freeview work after it's earlier failures. Time delayed programmes such as Film 4 +1 and E4 +1 which repeat existing channels are a waste of precious bandwidth, as also are the plethora of quiz and gambling programmes. I have not seen audience ratings for these but suspect they are low. Why didn't you provide some viewing figures for the channels on Freeview? Those who wanted multichannel TV have probably already moved from the terrestrial services. The key to the future success of Freeview has to be quality not quantity; quality in both programme content and HD picture resolution.

The 8 mB bitrate you have suggested will not be enough for a good HD MPEG-4 service, it is too low for good quality; who suggests this? Large panel TV's with 1920x1080 screens already in the market will show up the unwelcome effects of excessive data compression, especially when compared with other HDTV sources such as HD DVD players and game consoles. I would suggest you plan for 2 HDTV channels per 24 mbit multiplex. The EBU Tech 3312 report of Feb 2006 (Digital Terrestrial HDTV Broadcasting in Europe) covers these points, have you not seen this? The BBC/ITV HD tests from Alexandra Palace provide some suggestions on the data rate requirements for a high quality terrestrial service, see the interim report "A Higher Definition: The Digital Terrestrial HD Trial"

### Summarising my response.

- Your conclusions about low consumer interest in HDTV are wrong, HDTV is set to become the home TV standard by 2012 and you should be making plans for Freeview to provide this as soon as possible. You will need all the spare frequencies (The so called Digital Dividend) for a comprehensive HDTV service on Freeview.
- All the present UHF spectrum should be retained for public HDTV broadcasting, and certainly must not be sold off to the highest bidder.
- I agree with the proposal of channel usage (interleave space) for local TV. However these services would probably be better on a broadband delivery system.
- The interleave space could also be used by many different low powered, low bandwidth applications, and options are well worth developing.
- Mobile TV should not be allocated any space on these frequencies.
- Wireless broadband should not be given space on these frequencies.
- It is vital that you give plenty of time for the various PMSE and other users to make changes. Termination of the present arrangements at DSO is not viable without major difficulties and costs. There needs to be a lot more thought and consultation with this section of users. Generally this low power usage should be on a license exempt basis.
- The principle of holding back spare UHF spectrum space for future developments is sensible; if there is any.
- Bidding for UHF spectrum will only create monopolies which are usually not of benefit to the public. I am totally against your proposals on this; they look like a Government tax raising exercise.
- Trying to cram Freeview into less space than the present analogue spectrum seems to be a political objective, one in which the public will be the losers. You claim that you represent the best interests of citizens and consumers, please start doing this and use the Digital Dividend to provide a HD TV public service on Freeview.