

**Title:**

Mr

**Forename:**

Christoph

**Surname:**

Warrack

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

Christoph Warrack

**Representing:**

Organisation

**Organisation (if applicable):**

UK Search Party

**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.

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

These restraints will be of greatly adverse effect to the daily operations of the creative media industries.

**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?::**

Uses of the spectrum should be freely available to those who have bought the technology enabling them to use them. Ofcom does not and has not demonstrated that it owns this spectrum.

**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?::**

The spectrum is not Ofcom's to release.

**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.:**

Spectra is the plural for spectrum. No past present or future innovation should be restricted by any such proposed 'release'.

**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?..:**

This sounds agreeable.

**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?..:**

Strongly disagree.

**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?..:**

There should be no such auction if it restricts, prohibits, or interferes with the operating practices of the creative media industries whose reliability and economic effectiveness would be in dire jeopardy without them.

**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:**