

Comments:

Question 1: Do you agree with our proposals for sufficient evidence that a rental company's operations are based on equipment hire as opposed to equipment use that requires a licence? If not, what would you suggest as alternative evidence?:

I agree with your proposals.

Question 2: Do you agree that users who have held a valid channel 69 licence at any time during the 12 months prior to 2 February 2009 and can justify why it lapsed should be eligible for funding, subject to the other conditions outlined above? If not, what other time period would you propose and why?:

In general I agree, accept there have been times in the past when I might have been away abroad for a long period and only renewed my licence on my return. I would hold a licence each year but not for consecutive months.

Question 3: Do you agree that equipment purchased by eligible PMSE users between 2 February and 30 June 2009 should be eligible for funding, subject to providing evidence of the compelling reasons for making the purchase? Is there other evidence we should consider acceptable?:

I believe that even this minor extension of the eligibility period is illogical given that, up to this present date, there are no workable alternative frequencies that users can apply. Only Channel 69 currently gives me nationwide unrestricted access. If I have a need for more radio microphones I have to purchase Channel 69 at this present time. If all Channel 69 users tried to hire extra radio microphones there would not be enough units in the hire sector, and the hire companies would not be prepared to purchase more.

Question 4: Do you agree with our proposal that channel 69 equipment purchased after 30 June 2009 should not be eligible for funding? If not, what are the circumstances in which you think such equipment should be eligible?:

I do not agree at all. Until we have an alternative to Channel 69 we will still need to reluctantly purchase new units. What is paramount is that we service the companies we work for at all times.

Question 5: Do you agree with our proposal to consider on a case by case basis representations from PMSE users of channels 31-37 and 61-68 who feel there are special circumstances that in their view may entitle them to a different period of notice than others? If not, please state your reasons.:

I agree in general

Question 6: Do you agree with our approach to calculating funding based on the residual value of the equipment for the period during which a PMSE user

could reasonably have expected to have access to channel 69? If not, can you set out an alternative approach which meets the overall objective of promoting the efficient use of spectrum?:

I agree with your reasoning for promoting efficient use of the spectrum through grants, however I do not agree with your approach to calculating the funding. There is no definite 'sell-by' date for this equipment. All of my Channel 69 units are in perfect working order.

Question 7: Do you agree with our assessment that PMSE users could reasonably have expected to have access to channel 69 until 2018, but not beyond this date? If not, what time period would you consider reasonable, and why? In this context, please note, the fact that some equipment may be expected to operate beyond 2018 is not, on its own, a sufficient reason to reconsider that date.:

I do not except your assessment at all. I do not except the pre-condition that 'the fact that some equipment may be expected to operate beyond 2018 is not, on its own, a sufficient reason to reconsider that date? Simply if the equipment is serviceable and legal, I am still able to rent them as part of my profession. The removal of the frequencies would mean the loss of income and, potentially, considerable personal expenditure to replace what is still serviceable equipment

Question 8: Do you have receipts for your equipment? What else do you consider we should accept as evidence of the date and price of purchase and proof of ownership? :

I do have receipts for some of my equipment but not all. I would like to think you would except my Accountants statements as evidence for the remainder.

Question 9: Do you think we should make assumptions about the date of purchase of equipment for which where there is no evidence? If so, what assumptions do you think we should make?:

It would seem to me the date of purchase is irrelevant. I do see however that some proof of purchase would need to be established by the owner.

Question 10: Do you agree with the factors we propose to consider when designing the methodology for determining the funding payable for each piece of eligible equipment? Are there any additional factors we should consider?:

I agree with your methodology statement but hope that 5.18 will take into account all our reservations on your funding proposals.

Question 11: Do you agree with our proposal determine a set value and lifecycle for each equipment type, in the interests of simplifying the application and funding process? If not, what would you suggest? Do you

think there is scope to group similar equipment into larger sub-groups to simplify the process?:

I do not agree with this proposal. The simplest way would be to replace every Channel 69 with the new Channel 38 replacement. A full replacement policy must simplify all the concerns raised with no need to determine age or condition.

Question 12: Do you agree that a rate card approach would be a practical way of calculating the funding for each item of eligible equipment? If not, how do you consider the amount of funding for each item of equipment should be calculated?:

I agree that a rate card would be a desirable way to calculate funding.. My answer to Question 11 suggest that a full funding for new equipment should be applied for all eligible users, regardless of age and condition of their redundant equipment.

Question 13: Do you agree with our proposal not to distinguish between equipment by type of user? If not, what would be your preferred approach?:

I agree with proposal not to distinguish by type. I would also suggest that all eligible users should receive new equipment comparable to their existing Channel 69 equipment from the manufacturer's current range

Question 14: What type(s) of equipment do you own (e.g. wireless microphone, in-ear monitor) which uses channel 69? For each equipment type:(a)How many pieces of equipment do you own?(b) Can this equipment be modified (or re-tuned) to function in channel 38? If so, what would be the average cost of this modification? (c)What was the average purchase price (excluding VAT)? (d)on average, how many years would you normally keep this equipment in operation?(e)Does the useful life of equipment vary with the amount and method of use? If so, in what way?(f)What is the average age of the equipment?(g)Would you normally sell or dispose of the equipment at the end of its useful life? If sold, how much on average would you expect to receive for it? If disposed of, how would you normally dispose of it? How much does this disposal normally cost?:

- (a) I have 10 wireless microphones which use Channel 69
- (b) I cannot answer whether all of these wireless units can be modified. Only the manufacturer would be able to access this when we have the go ahead to change to Channel 38.
- (c) £2000.00
- (d) If maintained well over 10 years
- (e) Yes, as stated in (d)
- (f) Between 2 and 10 years
- (g) I have not sold any of my wireless equipment, but because of the change to Channel 69 they have little or no value.

Question 15: How would a decision to clear PMSE from channel 69 on 1 January 2012 affect you? What could we and the Government do to provide for an orderly migration in these circumstances?:

I think this would be a disaster for all of us in the Film Industry. When the cut date is reached we must be up and running on Channel 38. We also will need to be funded to be able to achieve this. It would be so much more flexible if we had both Channels at our disposal for a couple of years

Question 16: Do you believe we should facilitate early migration to channel 38 of those PMSE users for which this is convenient? If so, can you quantify the benefits? Would you take advantage of this option if it were available? :

I am sure this would be useful for some fixed site operators, but would not be of any help to myself. Unless as I have said in Question 15. I would order new equipment on Channel 38 at an early stage as long as it was funded by the Government.

Question 17: Do you agree with our proposal to allow each PMSE user to submit only one application for funding and to reserve the right to require the surrender of equipment for which funding has been received? If not, how do you suggest we ensure items are only claimed for on one occasion? :

I do agree

Question 18: What are your views on the three options for new licensing arrangements for channel 38 identified by JFMG? Do you prefer any different approaches?:

I would prefer Option 3 as this seems the most flexible

Question 19: Do you agree with our proposal to include frequencies from channels 39 and 40 in the shared licence arrangements for channel 38?:

I am not sure at this stage. However, if the plan is to provide further licensable frequencies in these adjacent channels post 2012, I would welcome the idea.