

Mr Andrew Gardiner

Additional comments:

Question 7.1: Do you agree that it is best to seek to establish MitCo in advance of the auction for later transferral to 800 MHz licensees?:

Yes

Question 7.2: Do you agree with our initial views on MitCo?s constitution and governance?:

No view

Question 7.3: Do you have any views on the proposed approach to the Supervisory Board.:

No view

Question 7.4: We propose that the 50 gain share be split between 800 MHz licensees based on the volume of spectrum they hold in the 800 MHz band. Do you have any comments on this proposal?:

No view

Question 7.5: Are the information parameters defined above and in Annex 5 sufficient to allow MitCo to accurately and reliably forecast the scale and scope of households affected by DTT interference?:

No view

Question 7.6: Do you agree the KPIs related to MitCo?s activities are appropriate and robust?:

No view

Question 7.7: Do you agree that the KPI for incentivising and measuring the proactive supply of DTT receiver filters to households affected by interference should be based on an assessment of the outcomes rather than the activities performed by MitCo?:

No view

Question 7.8: Do you agree with the approach we have outlined for incentivising KPI achievement and managing cases of non-compliance with KPIs?:

No view

Question 7.9: Do you agree with our proposed approach for managing MitCo's performance against other elements of service delivery that are not captured by KPIs?:

No view

Question 7.10: Do you think a hard or soft limit should be set in relation to platform changes? Do you have any other comments in relation to the platform change cap?:

No view

Question 7.11: Do you agree with the requirements we propose to place on licensees to address interference after MitCo closes?:

No. The budget for interference mitigation should not be limited, instead it should be a mandatory requirement that interference mitigation methods must be implemented as required by current broadcast customers. No current installation should be left without some form of reception as a result of interference, a small financial compensation package is not a reasonable alternative.

Question 8.1: Do you have any views on the nature or detail of the requirements we propose may be necessary as set out in this Section?:

No. The requirements are for one interference mitigation method per household however there are many dwellings which have multiple antenna feeds - in the simple case example of a split single external antenna feed to a living room and a bedroom but that could extend to more complex multiple fixed antennas, a combination of fixed and portable antennas, mast head amplifiers or even a full distribution amplifier installation. In these cases I feel it is unreasonable to introduce a known source of interference and not expect the transmitter of that interference to fully compensate those affected (either physically, with the required number of correctly terminated filters or other abatement techniques, financially to allow the purchase of such equipment or full supply and installation of alternative methods of reception) rather than allowing compensation only for the simplest, cheapest case possible of a single feed to the property.