

Additional comments:

Question 1: Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?:

No

Question 2: Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.:

No Views

Question 3: Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?:

Ofcom appears to be quite happy to shuffle the spectrum like a deck of cards, whilst no listening to individuals or groups in the PMSE field. I would like to see a Europe wide harmonisation of UHF frequency for Theatre and PMSE but see no evidence for this in your document. I do not feel therefore that the time is right to discuss moving the PMSE band until there can be a Europe wide agreement. If this was the case manufacturers would be far more likely to support the changes, and the possibility of upgrading older equipment would be more likely.

Question 4: Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most consistent with the DTT migration criteria? If not, why not?:

No Views

Question 5: Do you agree that a programme-control and -governance arrangement such as that outlined above is appropriate?:

No Views

Question 6: Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and 62? Are there any costs that do not appear to have been accounted for in any of these categories?:

No Views

Question 7: Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?:

No Views

Question 8: Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?:

Your question assumes that I agree with any proposed migration from CH69, Which I do not. Your figures are of course misleading as you only show 1700 licenses for PMSE in CH 69. We all know the figure is much higher(Probably 4 times this figure. I come in to contact with users on a regular basis who have no idea what equipment they own (or have been given to use), and are completely unaware of licensing requirements. I should point out that I always take the time to educate where ever possible. Many users assume the high cost of broadcast equipment covers any Licensing. Others plead ignorance of the law. Others assume the hire company will have sorted it out. In short there is a huge stock of unlicensed equipment, and therefore the impact on PMSE is much greater than you are estimating. Of course you could argue that it is their own fault for not having a license, but I would argue that education rather than any high handed approach would be a better way forward. Compulsary licensing info in every new UHF Radio sold, together with a TV like approach from the trade to supply customers details to Ofcom. This would give you a clear picture of the number of legitimate users on CH69.

Most PMSE do not require the use of adjacent bands as 8 channels is usually enough. Only very Large events , theatre and corporate require additional channels, and these are usually hired in from large pro hire companies, and as such we are not interested in what part of the spectrum they are in, merely that they will work as an interference free system.

In Conclusion Most PMSE use can exist within the confines of CH69, without the need for migration until a Europe wide agreement can be reached of Radio Mic frequencies. The Impact of any proposed migration will be larger and therefore more expensive due to Ofcoms misvaluation of the total amount of CH69 users.

Question 9: Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?:

No,

Question 10: Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?:

No

Question 11: Do you agree that channel 38 is the best alternative to channel 69 for PMSE?:

No, Many program makers have invested tens of thousands of pounds in broadcast quality radio equipment, which has a much longer depreciation cycle than 10 years. as an individual who has purchased this equipment I had hoped that I would have a much longer period of time to recoup my investment than the two years proposed.

Question 12: Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?:

No

Question 13: Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months? notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?:

No, far too short

Question 14: Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?:

I am a freelance audio engineer who owns his own equipment. I obtained my license on the 15th Feb 2009 so I could hire out my UHF microphones in a legal fashion. It was at this time that the whole CH69 PMSE migration was brought to my attention by yourselves. Your criterion for eligibility excludes me, a legitimate and legal user of CH69 equipment. The date should surely be the 20th April, or the date that any new legislation is actually passed, and not post dated in this way.

Also as mentioned Earlier I totally disagree with your depreciation values. These I suspect have been set by Hire companies and Pro Audio Resellers who both have a vested interest in the short cycles for Audio equipment. Hire companies want a quick maximisation of Hire revenue on a product, whilst always having the most up to date item available. Resellers want as shorter depreciation cycle as possible so they can sell us the latest models.

My equipment is all broadcast equipment which has significantly higher residual values than other Professional radio devices, and its residual value is often double that of other equipment. All my own equipment is purchased second hand, so I would like to see a factor of Replacement cost being included in your calculations. I do not want to find myself in the position where i cannot replace all my equipment with the same quality of broadcast equipment that will work in your proposed new channel.

Question 15: Do you agree that three years is long enough for PMSE to move from channel 69?:

No, far too short

Question 16: Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?:

This whole document is written in a style that bulldozers over the smaller private operator such as my self, who whilst operating within the law is not considered in any way. I am told that my equipment will not qualify for financial assistance as my license dates from 15th Feb 2009 (which is the first time i got to here about this debarcle) There is no information made widely available about the proposed changes, and if there had been then I could have purchased my Licence earlier. There is no mention of the benefits to PMSE by staying within CH69, and using a Band manager as originally proposed.

There is equally no guarantee that there is any longevity in any of Ofcoms proposed changes, these could be up in the air tomorrow so to speak. Manufacturers are not likely to make available new equipment until a guarantee of lifespan of the spectrum is made available. I would like to see harmonisation with Europe rather than the UK acting independently in a reactionary way.

By selling of the spectrum the only beneficiaries are the government.

I would like to see ofcom talking to all the manufacturers of equipment including Sony, Senheisser and Shure to see who can provide an upgrade service and who cannot.