



Issue 1

BT's response to:

**“Second consultation on coexistence of new services in the
800 MHz band with digital terrestrial television”**

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BT's response to the Ofcom "Second consultation on coexistence of new services in the 800 MHz band with digital terrestrial television"

1 Introduction

Recognising the importance of safeguarding the interests of DTT consumers against potential interference from new mobile networks, BT welcomes the updated information and proposals presented in this second consultation.

BT has an interest in DTT services through our BT Vision product and we are anxious to ensure that the introduction of new mobile networks in the 800 MHz is done in a way that does not adversely affect the service experienced by our customers. Hence we welcome the proposals from Ofcom on the details of the establishment, supervision and operation of MitCo to implement suitable mitigation measures and provide support to DTT consumers.

2 BT's responses to the consultation questions

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?

We believe that the creation of MitCo in an expedient manner is important, and therefore we would support its establishment in advance of the auction.

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

We agree with the proposals for the constitution and governance of MitCo.

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

Ofcom's proposal for the composition of the "Senior membership of the Supervisory Board" appears to offer a reasonable balance between the main interested parties.

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 comment

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?

At this stage we believe that the parameters detailed will enable likely DTT interference to be modelled by MitCo. The limitations of DTT coverage predictions (which are offered at a granularity of 100m x 100m pixels) will result in any modelling results being an approximation when considering individual households.

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

The proposed KPIs appear to be appropriate and we have no further comments at this stage.

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?

Since the outcome of pro-actively supplying DTT receiver filters has a degree of predictability, we agree that assessment of this KPI should be on the actual outcome, rather than purely on the amount of activity by MitCo irrespective of its effectiveness, despite the added complexity in measurement that this entails.

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 comment

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 comment

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?

We would not want to see DTT consumers lose their TV reception completely without any compensation, simply because the hard limit has been reached, and MitCo is not permitted to offer further assistance. However, conversely, the number of consumers requiring a platform change should be reduced to the absolute minimum possible. All reasonable measures should be applied, including provision of improved aerial installation and wiring, as well as improved DTT equipment, before a customer is considered for a platform change. The platform change should NOT be considered as the easier option, when other engineering measures could be applied at the customer's premises.

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

We believe that the proposed requirements on licensees are very appropriate and should be applied. However, we also believe that a process should be laid down, in the event that Ofcom should identify any new base stations installed after the closure of MitCo, to which network mitigation measures should be applied. It should not be left as a purely voluntary measure whether the MNO applies the additional measures, but rather Ofcom should have suitable powers to enforce the MNO to do so, if there are clearly demonstrable benefits for DTT to be gained in applying network mitigation measures to any new base stations.

With regard to the closure of MitCo, this decision should only be taken after full consultation at the relevant time, once there is confidence that the need for future mitigation measures is well understood and will be properly addressed.

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?

We support the proposals laid out in this section, for the requirements on new licensees. Furthermore, in accordance with our response to Question 7.11, we propose that clause 8.17.5 should be further elaborated, to ensure that Ofcom has the power to require a network operator to apply network mitigation measures to any new base stations deployed after the closure of MitCo, if it can be shown that the applying of such measures would have a material effect on the mitigation of interference to DTT.

END