

Confederation of Aerial Industries and TV and Satellite Ltd

Mr Les Hampson

**Additional comments:**

The following points concern me

1. Ref 1.8 "50:50 gainshare of any underspend between new licensees and Government when MitCo is closed down." Surely this will lead to MitCo/licensees trying to cut corners and do 'half a job'! It is also assumed that an underspend will happen, ref 1.9 "How the gainshare should be split among new 800 MHz licensees when MitCo is shut down."
2. Who will sit on the 'Supervisory Board' from Consumer Groups? What about representation from the aerial installation and manufacturing industry?
3. How will MitCo allocate filters? A filter for Crystal Palace will be much simpler and cheaper than one for transmitters that use channels higher up the band such as Oxford. How will MitCo decide what transmitter the customer is on? This would be particularly difficult where reception is available from more than one transmitter. (Milton Keynes area for example can receive from both Oxford and Sandy Heath). What about where any form of amplification is used - who will advise on where to fit the filter and if that amplification is on the roof who will fit it? There is a definite health and safety issue here if MitCo just send filters out and expect the public to fit them.
4. How will MitCo cope with communal systems and commercial premises? Many of these systems have maintenance contracts on them that are operated by reputable aerial installation companies, whilst others will still be under warranty. Adjustments made by third parties will no doubt infringe the conditions of those contracts.
5. Whilst the CAI do not condone the use of indoor aerials, and realise that this is an unprotected service, there are many such aerials in use that are at present giving adequate coverage. How do MitCo propose to deal with the issues that will arise?
6. I am not sure that enough consideration has been made on other interference that may be present (and is already there) but receivers are coping with. Once LTE starts transmission this could be enough to push the interference to a level where problems arise. I am pretty sure that the modelling has only considered the new LTE interference and is ignoring that which already exists. The result being that many more households could well be affected than the predictions.
7. Who pays once MitCo has been shut down?

**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, along with the 'Supervisory Body' and as soon as possible.

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

Partly, but I do think that representation from the aerial industry should also be included. This could also take a large chunk out of the £180 million

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

As already mentioned in 7.2 other parties should also be involved.  
What powers will the board have to force MitCo down a particular track?

**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?:**

Do you really think there will be any left if the job is done properly?

**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?:**

I don't believe that these parameters will give a reliable forecast of the number of households affected.

Points already mentioned -  
LTE topping up existing interference  
Communal and Commercial systems

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

No, fitting a filter is not going to solve all issues. Not enough thought has gone into where amplifiers are being used and communal systems.

**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?:**

Yes, but again what about amplifier use?

**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, it gives more priority to saving money rather than curing interference.

**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?:**

As 7.8

**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?:**

It has to be a soft limit, and if necessary the £180 million may need looking at again. As yet nobody knows on the number of households that will be affected and the number of TV sets in each property that will need converting (or is the proposal for just a single set top box to one TV and forget that the customer may have recently paid hundreds of pound to upgrade to DTT with new aerial, TVs and PVR?).

What of communal systems that are just MATV? It could well be a huge job to convert a block of flats to IRS.

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

No, this should be in the hands of an independent body such as what used to be RA.

**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?:**

Yes

Section 8.12.5 restricts the number of platform changes. Is this going to be achievable? Many areas are set to use channels very close to LTE transmissions. Oxford, for example is set to use channels 50, 53, 55, 57, 59 and 60 as the final situation. Many of these households will require a platform change meaning the numbers may well exceed the predictions.

Section 8.17.5 is heavily biased towards the new licence holders

a) does not include full information on the base station power, aerial coverage filtering etc, also it does not appear to cover other transmitters down to micro cell level which will have a major effect on interference. This requirement should cover all transmitters on the network

b) Any power changes should be notified in advance and an interference assessment and mitigation undertaken before implementation

c) The ability of the base stations interference issues do not cease because five years has passed, the requirements should not have a time limit