

Response to Second consultation on coexistence of new services in the 800MHz band with digital terrestrial television

From Brian Copsey

Overview

The overall impression of the document is that Ofcom are seeking to minimise the costs and maximise profits to the new licence holders at the expense of existing TV licencepayers.

This impression is given substance by:

- A split of the “profits” when MITCO is shut down (section 3.21), *hardly an incentive to do a good job!*
- Totally ignoring the effects of user equipment interference to both individual TV (Technical analysis of interference from mobile network base stations in the 800 MHz band to digital terrestrial television) and communal aerial systems (ERA Report)
- The *DTT interference report* has major flaws: it does not include the issues of installing filters to of roof or loft mounted amplifiers, a very different response would have been forthcoming if those interviewed had been told that they would either have to fit filters to their external aerials themselves or pay to have it done; 150 interviews hardly gives a reasonable sample of the 2.3 million affected viewers. These are Ofcom’s figures other estimates using Ofcom data look at much greater numbers of three to four times the 2.3 million households affected
- Ignores any but the “main” TV when most households have multiple TV sets (section 3.5)
- Ignores the costs of those with indoor aerials (and presentably good reception) having to install a external aerial (if this is physically and legally possible)
- Restricts MITCO to providing a limited number of filters per household (section 3.5)
- Restricting MITCO to “sending” out filters without any physical or technical assistance to householders, except in the case of a relatively small number of people with disabilities (section 3.4 and 3.5))
- No responsibility for addressing **ALL** interference issues (including cost) on the licence holders unlike other Government’s.
- Increasing base station power to 64dBm
- Shutting down MitCo one year after the first roll out is complete minimises, costs on the new Licence holders and removes a central point for customer complaints when networks are expanded

Major Omissions

1. Ofcom treats the interference issue as if it were a temporary phenomenon whereas it will be with the general public for the foreseeable future and future changes in spectrum use will extend the problems. A major plank of the European program is that the “polluter pays “in this case those polluted pay.
2. Issues of the user equipment have been totally ignored, one area which should be addressed is the conformance of LTE user equipment to all the relevant European and UK requirements , a regular conformance check should be built into the licence requirements carried out by independent bodies
3. Many studies on the interference issue both UK and European clearly identify that poor domestic TV installation is a major contributor to “interference”, since this is the first but not the last change in spectrum use for the 470-862MHz broadcast band encouragement both by provision of information and financial to improve these installations should be a major part of Ofcom’s approach in ensuring the future of the DTT platform.
4. Supervisory Board does not appear to include representatives of the many industries impacted by the new licences who would have a good knowledge of the issues involved, notable exceptions are:
 - The Aerial installation industry
 - PMSE industry
 - Entertainmentindustry

Safety

As the general public will have to pay for the fitting of filters or replacement of their amplifiers to their external or loft aerial systems, many will seek to save money in these difficult financial times and carry out the work themselves, without the correct equipment or safety training. MitCo will bear the responsibility for these issues if it continues with a policy of **only** providing filters.

Financial incentives should be provided by MitCo to use professional qualified people for this work

Response to 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?

Yes, this and the supervisory board should be set up as soon as practical, preferably autumn 2012

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

No, it reminds me of "turkeys voting for Christmas" an independent Chair from the supervisory board should be appointed, preferable with vice chairs from broadcast and customer organisations.

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

Yes,

- it omits the industries affected by the new licences notably the aerial installation and PMSE industries
- It has insufficient powers to force licence holders to mitigate interference, for example it cannot tell them to switch off base stations when interference has not been mitigated

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?

Yes, this encourages MitCo and government to penny pinch on the interference mitigation. If there is any money over it should be used to fund the Ofcom radio interference service by removing the fees to customers

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 they appear to do the reverse, all interference issues should be addressed including **ALL** aspects of communal aerial interference and aerial amplifier issues

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

No, they omit the issues mentioned in response 7.5 and appear to encourage filter use rather than network mitigation which would be a more permanent solution to the affected geographical area

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 a major failing is if there are aerial amplifiers present, it suggests that the provision of a filter to these households would be treated as a “clear” when it is obviously not

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, the approach appears to be based on minimum cost to MitCo rather than restoring DTT reception

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, the approach appears to be based on minimum cost to MitCo rather than restoring DTT reception

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?

Soft limit, the objectives should be to restore DTT reception to customers rather than reduce costs.

A second point is that platform change will not solve all the problems and will (again) be a long term cost to the viewer

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

No, an independent body should be funded such as the Ofcom radio investigation group rather than returning to “turkeys voting for Christmas”. This also provides a central point for complaints

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 8.12.2 restricts filters to those sets not using set top aerial's, in many cases a filter may work, or assistance should be given with provision of a suitable aerial, the UK TV Planning Model has presently provision for mobile reception which these installations use, Ofcom are removing this facility again cost saving for MitCo

Section 8.12.5 restricts the number of platform changes, this is wrong if we consider those arrears using channel 60 the number requiring platform change may well exceed the minimal numbers suggested by Ofcom, why should TV licence payers be exploited by the new licence holders in having their DTT reception removed?

Section 8.13 *ensure that interference into DTT is appropriately mitigated* unfortunately the proposal do not address the full restoration of the DTT platform to many TV licence holders

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