

Ofcom Consultation Document

Coexistence of new services in the 800MHz band with DTT

Consultation Questions and response

Consultation question 1: Do you have any comments on our modelling approach and assessment of numbers of households affected?

We believe that the modelling approach needs to take further consideration of portable antenna and amplifier installations. We understand the difficulty in establishing the typical usage figures but the use of portable antenna and amplifiers suggest to us a weaker resilience to the interfering signal source. We believe that such installations are more typical for 2nd and 3rd TV receivers in the home. Based upon this we believe that the assessment of households affected is possibly lower than the Ofcom assessment.

Consultation question 2: Do you agree with our high level conclusions on mitigation options?

We agree that the use of filtering at the receiver input and at the base station transmission provides the most effective solution based upon results and cost. The mitigation of the base station antenna polarisation can also be a benefit without any required action of the consumer. However, we feel that re-orientation of the DTT reception antenna would not only add to cost but possible consumer dissatisfaction as they may lose specific regional services desired or provide a lower quality service that could be effected by external influences such as being more susceptible to impulse noise interference.

We do not agree that consumers should be forced to move platforms as a solution. The issue with the alternate platforms is that from a satellite perspective, users lose service from time to time due to atmospheric conditions or external interferers such as impulse noise. With satellite installations from time to time re-alignment of the dish is required adding additional cost to the consumer. With the cable perspective the key issue here is monthly cost which the user is not currently paying. Additionally both platforms are not ideal in case of multiple room installations.

Our general opinion is that if a consumer received a DTT service and was satisfied with their DTT services prior to the launch of the 800MHz mobile system then the solution should result in the same level and quality of service prior to the launch of the 800MHz mobile system.

Additionally we believe that the mitigation solutions do not consider issues related to portable antenna usage. Filtering with portable antenna solutions may only weaken the reception performance for the receiver and re-orientation may not be practical.

One thing that is not clear to us is why there is only a 1Mhz guard band at channel 60 and a 11Mhz duplex gap between the base station transmit frequencies and the mobile transmit frequencies. Why this duplex gap can't be reduced before implementation to reduce DTT interference issues

Consultation question 3: Do you have any comments, views or evidence that you would wish to be considered in our further work looking at the appropriate level of consumer support?

In relation to the consumer support issue, we understand that the communication and planning of this 800Mhz mobile service is yet to be scheduled in detail and therefore clear actions are difficult to specify at this stage. However, we do not see any evidence that the receiver manufacturer has been considered in the scope of consumer support. It is our belief that, even with sufficient communication to the consumer, the consumer will still look to the consumer manufacturer for support. After all the basic understanding is that “my receiver has stopped receiving”.

In addition to consideration of the manufacturer, in our experience response time to the consumer is critical. We believe that the proposed body will need to have clear KPI's in place to establish the expectation of the consumer to recover the lost service within a set period. If this is taken into account the issue of pro-active action against reactive action may be clarified. That is based upon an agreed modelling solution the solution maybe to supply filters to the households within a modelled interference area and be reactive to those households outside the modelled interference area.

Consultation question 4: Do you have any comments or views on how we have assessed the approaches and our preference for the hybrid approach?

We believe that your assessment to the possible approaches is fair. However, we do not think that your preference for a hybrid approach will not result in the best solution for the consumer. Additionally we believe that a hybrid approach in these circumstances will lead to slower decision making. We believe that this 'MitCo' body needs to make decisions without the influence of the new service operators to achieve the best possible result for the consumer. This is not to say that the body should not take into consideration the related input information from the operator on the facts and related costs.

Consultation question 5: Do you agree with the options, the assessment approach and our initial conclusions? What are your views on cost risks and how to deal with them?

Our only opinion is that the consumer should not bear any related costs that are considered to be unreasonable.