

Response: Name Withheld

Question 1: Have we correctly identified and characterised the potential costs set out above, and what other costs ? if any ? should be taken into account in our assessment?:

No. There are a significant number of UK households where only 3 PSB muxes are available and no commercial muxes. No local TV and no new 600MHz muxes will be available to these households either. The cost of maintaining the PSB muxes in these areas should be taken into account too since there is an alternative (Freesat) available with greater consumer choice. The cost of moving the remaining small number of 3Mux DTT users to alternative content delivery means should be considered.

The opportunity cost of the DTT sites should also be considered. In the absence of DTT transmitters many could be repurposed as wind farms.

Question 2: What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential costs? Please identify any sources of specific evidence to which we should have regard.:

Ofcom should gather data on the numbers of households using the DTT and Freesat platforms in the 3 Mux locations and use accurate numbers to evaluate costs to consumers and savings on transmitters.

Ofcom should also study the cost and benefit of adoption of a new infrastructure for DTT based on the low tower cellular concept as proposed by RSTV and described in the RSTV response to the WSD consultation. This approach could be at UK level but would ideally be harmonised over Europe to reduce the DTT interference environment. It should allow an increased efficiency of DTT spectrum use in either case.

Question 3: Have we correctly identified and characterised the potential benefits set out above, and what other benefits ? if any ? should be taken into account in our assessment? :

The potential closure of 3mux transmitters would release more spectrum to facilitate wireless broadband in rural areas.

Question 4: What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential benefits? Please identify any sources of specific evidence to which we should have regard. :

As in Q2 Ofcom should determine the number of households who have chosen Freesat in preference to 3Mux DTT and determine the cost of moving the remainder to Freesat.

Question 5: In particular, what is your view of the likely future demand for additional sub 1 GHz spectrum for the provision of mobile data services, and what evidence supports this view?:

No comment.

Question 6: Should we place different weights on some costs and benefits than on others, for example depending on whether costs would be borne by consumers, DTT operators, or mobile operators? :

No comment

Question 7: Do you have any other comments on the work we are currently undertaking on potential costs and benefits? :

No

Question 8: Have we correctly identified the costs and benefits that could vary depending on the timing of release, and the impact of those factors? Are there other costs and benefits which would vary depending on the timing of release of the 700 MHz band which we should take into account?:

No comment

Question 9: How quickly could the 700 MHz band be released? What would be the impact on DTT infrastructure costs of releasing at the earliest possible time compared to a later time? What would be the factors which affect these costs?:

No comment

Question 10: How, and to what extent, are the costs for existing (PMSE) and potential (WSD) interleaved users of the 700 MHz band likely to vary depending on the timing of release? What would be the factors which affect these costs?:

No comment

Question 11: Should we consider any other cost-related arguments / evidence in favour of an earlier or later release date?:

No comment

Question 12: What would be the impact on mobile broadband delivery and competition of releasing the 700 MHz band later rather than sooner? :

No comment

Question 13: Should we consider any other benefit-related arguments / evidence in favour of an earlier or later release date?:

No comment

Question 14: Is the range of potential dates for release likely to be wide enough to merit consideration of an incentive auction approach?:

Inefficient use of spectrum should be discouraged by regulation and not incentivised by the promise of rewards for improved efficiency.

Question 15: If so, what are the challenges to designing an effective incentive auction in this case, and how might these challenges be addressed? :

Incentives are not appropriate for inefficient users of spectrum

Question 16: If we followed an incentive auction approach, how should we take account of wider costs and benefits ? i.e. those not felt by participants in the auction?:

Ofcom should not reward inefficient users of spectrum.

Question 17: Do you have any views at this stage as to the parameters of an incentive auction, such as the default date and payment mechanism?:

No

Question 18: Is there a version of the overlay auction approach which could be suitable for 700 MHz release?:

No comment

Question 19: What are the benefits and risks of conducting an overlay auction in this case?:

No comment

Question 20: Have we correctly identified and characterised the potential impact of 700 MHz release on consumers accessing DTT? What other impact ? if any ? should be taken into account in order to identify pre-emptive measures to reduce this impact?:

You have not considered the potential role of Freesat in providing an alternative means of delivery .

Question 21: Do you have any comments on the pre-emptive measures relevant to DTT identified above? Are there other pre-emptive measures we should be considering?:

Ofcom should consider informing the public in 3mux areas of the availability and wider choice of Freesat.

Users who have to change aerials to maintain DTT should be given information on the alternative of Freesat.

Question 22: Have we identified the correct measures to support consumer adoption of DVB-T2?:

No comment

Question 23: What regard, if any, should we have to wider technical evolution of the DTT platform, such as HEVC? :

Ofcom should take account of wider developments . RSTV considers that a low tower cellular approach to TV could facilitate local advertising and increase targeting of adverts.
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Question 24: Have we correctly identified and characterised the potential impact of 700 MHz release on PMSE users? What other impact ? if any ? should be taken into account in order to identify pre-emptive measures to mitigate this impact?:

No comment

Question 25: Do you have any comments on the pre-emptive measures identified above? Are there other pre-emptive measures we should be considering?:

No comment

Question 26: Do you have suggestions for how we can assess the impact on PMSE users and equipment if 700 MHz is no longer available for PMSE use?:

No Comment