

Blakeglow Ltd

Additional comments:

While I welcome this second consultation this consultation should have included all the UHF spectrum changes such as white spaces devices so that all the implications, such as the effects on the EMC environment, could be considered together rather than in isolation.

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?:

MitCo should be set up prior to the start of the auction.

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

It is essential that representation from the aerial industry sit on the 'Supervisory Board' and I suggest that some one from the CAI should join.

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

7.3.

The supervisory board needs to consider the plan MitCo will have in terms of DTT reception problems and how some of the basic questions are resolved such as

Sending out, proactively, filters could present problems in that it will not be known from postcodes which transmitter is being used. In London, for instance there are 49 relay transmitters in addition to the Crystal Palace main transmitter and three secondary transmitters. Each transmitter has its own channel plan. Fitting the wrong filter would for some make little difference to the reception problem and likely confuse.

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 the decision be made which transmitter the customer is on or will the sharpest, most expensive filters be supplied everywhere ?

When 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?

The term reception problem needs defining to answer the question when all, a number of, or just one multiplex is affected and how it is affected.

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?:

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?:

The revision of the quantity of affected homes is more reasonable than the first estimate however there are still some unanswered questions which will have to be faced

How will the problems with communal systems and commercial premises be resolved?

How will the use of indoor aerials be resolved, there are many such aerials in use that are at present giving adequate coverage

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

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?:

Question 7.8: Do you agree with the approach we have outlined for incentivising KPI achievement and managing cases of non-compliance with KPIs?:

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?:

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

What of communal systems that are just MATV? It could well be a expensive 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.

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?:

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