Ofcom Advisory Committee for Scotland response to The Future of DTT Consultation document

ACS consider that it is a sensible approach to clear one PSB multiplex of existing services and to use it for MPEG-4 and DVB-T2. This will ensure that no services are lost to viewers with the "older" technology whilst a cleared multiplex will give the chance for providers to be innovative as well as being able to provide some services in HD. Hopefully the commercial multiplexes will follow that route, leading to a single equipment upgrade allowing access to any new services.

ACS agree that there is scope for innovation in the mix between SD and HD services – for example in different parts of the day. A regulatory requirement for services in HD risks getting the mix wrong. Many programs do not benefit from being viewed in HD, eg news, repeats of old programmes etc and it would be wasteful of spectrum to make it a requirement that all programs on eg BBC1 be broadcast in HD.

There is a specific concern for the Border region. Many people there will already have upgraded their set top boxes etc ready for DSO. They will be a) upset and b) confused to be told that in order to access any new SD or HD services on Multiplex B they will need to upgrade again. There will be questions about why this wasn't flagged up to them earlier. Equally, if we do let them know before DSO in Border, it will cause further confusion among the less technically literate and more vulnerable, who are already struggling with the technical issues. If set top boxes/TVs compatible with the new format are not expected to be available till late 2009 then Border customers are not going to be happy. Careful consideration needs to be given to how this is handled. When Ofcom issues a statement on this in March 2008, it could lead to a lot of confusion and negative publicity in the Border region. How the message can be got across about the new services in HD or SD which will only be available after switchover will be particularly challenging.

It is not clear how this fits in with the 'Freeview Lite' issue? Will customers relying on relays, as many in Border are, be more seriously affected by these changes or not? Will they have access to the HD channels?

The ACS are concerned that another commercial service on Multiplex 2 will not be available in Scotland, Wales and Northern Ireland in order to ensure PSB capacity is available to carry S4C, GDS and TG4. Whatever this service is (a Channel 4 video service by the look of it), someone will be upset. Can we ensure that this service can be accommodated on one of the commercial multiplexes for Scotland, Wales and NI? Even if it is, there is less geographical coverage on these multiplexes, how badly will that affect Scotland?

ACS consider it necessary to retain a regulatory function in the provision of DTT and it would appear that spectrum for the new channels such as the Gaelic channel (GDS) in Scotland will be safeguarded. ACS also note the suggestion that there should be a video service reserved in Scotland, Wales and Northern Ireland. This is welcomed and ACS look forward to seeing how this could be used by either the commercial or public sector.

ACS consider the reorganisation of the multiplexes to be good housekeeping of the spectrum available and it does indeed create a "virtuous circle" whereby consumers can receive the same services regardless of emerging and new technologies. This is why ACS believe that a regulatory framework is necessary to protect the interest and the pockets of the consumer.

Chairman, Ofcom Advisory Committee for Scotland 30 January 2008