

Name withheld

Additional comments:

Fundamentally the sub-microwave radio spectrum is better suited to broadcasting the same data to many people, rather than many individual data streams. It is therefore better suited and more efficient to use this limited resource for services such as DTT rather than mobile network services. As such DTT (and other similar technologies such as an improved digital radio) should take priority, and other uses only be permitted where they do not significantly degrade these broadcasts.

The DSO was presented to consumers as a means of improving both the quality and choice of terrestrial TV, and for it actually to result in a degradation of service is both disingenuous and immoral.

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

DTT consumers using personal computer tuner cards do not appear to have been considered. A laptop with a DTT tuner becomes a low cost (if already in use for other things) high quality mobile TV with PVR capability. In this form it is likely to be used with a small portable aerial, and large filters may not be practical. Portable DTT should become much more feasible after the DSO when signals are broadcast at full strength, and this capability should not be sacrificed to other mobile services.

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

A few mitigation options do not appear to have been considered:

1) Prioritise DTT multiplex/channel allocation to certain consumer channels. Channels currently available on terrestrial analogue broadcasts (BBC1, BBC2, C4, ITV1, C5) should be prioritised and moved to DTT channels as far as possible from potential interference. Other channels should be evaluated on popularity and value to the consumer (not value to the broadcaster), with the least worthy (home shopping, adult?) at most risk of loss to interference. BBC appears to be allocated C60 after DSO at Whitehawk Hill - the worst possible choice on these grounds. This would make platform changes and other more intrusive or costly mitigations less necessary if the channels consumers want to watch are still available.

2) Increase the width of the guard band between DTT and mobile services. In some areas this may mean prohibiting mobile operators from using lower band ('A'). Reorganisation of the 800MHz band (eg. interleaving mobile and base station bands) may facilitate better use of remaining frequencies in these situations.

Platform change may not be feasible in many cases. In conservation areas, satellite dishes are restricted. Provision of cable TV is limited and IPTV is inadequate. Use of 800MHz should not reduce TV services below current levels.

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?:

no

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

The balance should be in favour of the DTT consumer rather than the mobile network provider. Ofcom should be protecting an existing service for individuals who have little or no ability to influence the outcome, rather than the financial interests of large multi-national companies.

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?:

Yes, the costs and risks should be borne by the mobile network providers who will recoup them from subscribers to their service.