

Mr J.P Gilliver

**Additional comments:**

There seems to be an underlying assumption that the process will go ahead, regardless, and that the important stakeholders are those working in the various industries involved, with the \_consumers\_ of DTT being considered somewhat of lower importance, especially those who are likely not to know of the existence of Ofcom.

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If - as seems likely - encoding methods for DTT become necessary for channels other than HD ones that are incompatible with some types of receiver, then moves must rapidly be made to ban the sale of such receivers (set-top boxes, TVs, or whatever). This may be seen as beyond OfCom's remit, but all agencies will claim it is beyond their remit, so the matter needs to be addressed.

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Licences to non-DTT users of the new spectrum should be conditional on their willingness to provide, \_on a continuous basis\_ not just initially (because of house moves etc.), \_adequate\_ filters to minimise overload of receivers.

**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?:**

I feel \_insufficient\_ attention has been given to the costs to consumers - especially the elderly and/or non-technically-minded.

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Assumptions of penetration should also take into account \_all\_ sets, not just the "primary" one.

**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.:**

You should consult, for example, Saga, RNIB, RNID, and similar bodies.

**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? :**

No comment.

**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. :**

No comment.

**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?:**

Demand for such services will always expand to fill any capacity offered.

**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? :**

Costs to consumers who do not want the extra services provided should be given high weighting.

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

See "additional comments".

**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?:**

No comment.

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

I fail to see how the \_consumers\_ of DTT - stakeholders who are mostly being ignored in this consultation - will benefit in any way from any auction.

**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?:**

Make any grant of licence to an auction winner conditional on their willingness to supply (on a \_continuous\_ basis) adequate filters to any DTT consumer adversely affected by their transmitters.

**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 beyond those already made.

**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 seem to have implied the possibility that higher data compression methods (i. e. incompatible with many existing receivers) might not be necessary; given the reduction of spectrum allocated to DTT as a result of the proposals, it seems unlikely that such changes will not be necessary.

**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?:**

The measures described mostly seem to involve the assumption that consumers will purchase new equipment.

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

No: in particular, there is no mention of the requirement to publicise the fact that DVB-T2 receivers will not only be required for the reception of SD signals, rather than only for HD.

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

If there is any intention to adopt any new encoding mechanism for general use, rather than just for some new channels, then (a) this fact should be given saturation coverage, (b) the sale of incompatible receivers should be blocked at the earliest opportunity, at least a year before the switch.

**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.