

Additional comments:

These responses to the consultation questions are given from a Scottish perspective and relate to the clear desire to deal with the opportunities in the digital dividend on a Scottish specific basis.

Scottish Screen is the national development agency for the screen industries in Scotland. We aim to inspire audiences, support new and existing talent and businesses, educate young people, and promote Scotland as a creative place to make great films, award-winning television and world renowned digital entertainment.

Question 1: Do you have any comments on the application of the protection clause to all new licences for the 600 MHz band and geographic interleaved spectrum?:

It would seem prudent to apply a protection clause to licences but we suggest that defining the nature and extent of the clause can wait until we have undertaken a Scotland wide survey of potential uses and technical considerations given the unique location and geography of Scotland.

Question 2: Do you have any comments on our approach to technical licence conditions for the 600 MHz band and geographic interleaved spectrum?:

We agree with the approach to technical licence conditions but again suggest that, given the unique location and geography of Scotland, there may be benefit in assessing technical considerations for Scotland separately.

Question 3: Do you have any evidence using frequency offsets with DVB-T2 EC signals might have an adverse impact on uses of adjacent interleaved spectrum?:

No

Question 4 Do you have any evidence mobile services using the 600 MHz band and geographic interleaved spectrum could cause harmful interference to cable television?:

No

Question 5: Do you have any comments on protecting PMSE in channel 38?:

No

Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?:

We agree in principle with the way in which Ofcom proposes to deal with the non-technical licence issues; however we are not convinced that the indefinite licence term offer, nor the capacity to trade licences, is the best way to deal with spectrum in Scotland.

Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?:

Ofcom has recognised the unique nature of the geography of Scotland and acknowledged the desire for a Scotland specific broadcasting infrastructure, however the potential for extending the range of mobile broadband services and indeed the potential of extending the range of mobile 2G and 3G telco networks have not been made fully explicit as part of this consultation.

We believe that, with regard to the frequencies available, DTT and mobile broadband allocations will give the greatest benefit to Scotland.

Question 8: Are there any distinctive considerations and uses for this spectrum in the nations and regions of the UK?:

We suggest that, as has been recognised by Ofcom, since Scotland has a unique situation and opportunity as part of the digital dividend and that the current international negotiations on clearing the 800 MHz band mean there is now less certainty about the extent to which geographic interleaved spectrum will be available, we analyse the potential spectrum allocation on an Scotland specific basis.

Question 9: Do you have any comments on our continued inclusion of channel 36 in the award of the 600 MHz band?:

No

Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?:

We believe that there may be some disjoin between the market led approach and the social benefits gained from any spectrum allocation. We propose that any auction is forestalled by a full analysis of the potential uses of spectrum in Scotland.

Question 11: What information can you provide on packaging and award design considerations?:

We suggest that Ofcom doesn't package awards in a way that will not allow Scotland to make best use of the spectrum available and wait until it is clear what the EC will declare on the 800 MHz frequency and recognise that one size doesn't fit all.

Question 12: When would you like to start operating new services using the 600 MHz band and/or geographic interleaved spectrum?:

No comment