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700 MHz and 3.6-3.8 GHz award
Spectrum Group
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Ofcom Consultation – Forces TV

We are responding in relation to the proposed approach to DTT use of the 700 MHz duplex gap after the award. This is set out in Section 10 of the consultation.

Firstly, by way of context, our organisation is a charity whose aims are to entertain, inform, connect and champion the armed forces community. One of the most effective ways for our Trustees to fulfil these aims is through broadcasting nationally in the UK on our channel, Forces TV, and we have been delighted to have been able to do so on a 'free to air' basis on Arqiva's Com 8 platform since 28 September 2017.

Our views on this issue are as detailed below:

- From our perspective the benefits of the continuing availability of Com 7 and Com 8 in the duplex gap are clear in that it allows the provision of 21 additional channels to Freeview viewers. This facilitates competition with other HD orientated subscription channels and also, critically for Forces TV, provides a platform for SD channels, like ourselves.
- Unfortunately, Ofcom's proposal of a rolling one-month notice period approach after May 2020 in no way reflects the way DTT multiplex contracts are entered into and nor does it reflect how far in advance advertising is booked. This approach would also not be compatible with

the practical realities of running a TV channel, for which content needs to be acquired months in advance, as does the effective planning of staff resources and scheduling.

- To provide the level of certainty required to run the channel, we would need timelines in the region of 6 – 12 months and certainly no less than 3 months.
- Based on our understanding we would suggest that the reality is that mobile operators will not even be close to being ready to deploy SDL services in the duplex gap by May 2020. This would, in turn, suggest that there is room to provide longer timescales and considerably more notice to the broadcasters currently on the Com 7 & 8 multiplexes.
- We would suggest too that there is a real risk that a poor policy position could leave valuable spectrum unused, which would have reputational implications for Ofcom, given its statutory duty to promote efficient use of spectrum.

In conclusion, we very much hope that Ofcom are able to adopt a more flexible approach to licensing in the duplex gap. This would provide Forces TV with the increased degree of certainty we would need to be able to continue to broadcast our channel 'free to air' on Com 8 during the gap period. It would also ensure that Ofcom is in a position to appropriately fulfil its statutory duty to promote the efficient use of the spectrum.

I can confirm that none of the responses in this letter need be treated as confidential, apart from the e mail address and telephone number contact details.

Yours sincerely



David Hamilton
Director of Finance

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