

Mr Mark Templeman

Additional comments:

It should be considered that at present (and for the past several decades), the PRIMARY USERS/LICENSEHOLDERS of the spectrum encompassing the 800MHz band have been the Television License payers. These should be protected at any cost, and not one single TV subscriber should be put into a disadvantaged position due to the sell-off of part of this spectrum.

Speaking as a license payer who lives in an area likely to be affected by this proposal, and also living in an area that under para 6.72 qualifies me as not being able to take advantage of a Platform Change solution (No satellite due to terrain, no cable provision, poor Broadband speeds, some/all DTT services off a vertically polarised local relay in the 'upper 50's' channel allocation, I find it quite disturbing that like many others, we could lose part or all of our DTT service for a period, or possibly indefinitely.

If 'MitCo' are as poorly organised as many government-appointed bodies, how quickly will any interference issue be handled and mitigated?

Siting of 4G base station equipment should be subject to much more stringent planning controls than the current fiasco concerning mobile operator equipment, where councils and the general public have no real rights to object to new base stations being built. There needs to be a requirement that any operator who proposes a new 4G base station is required to model/demonstrate the effects of the service to the DTT service in the locale, including the fully costed mitigations proposed ON THAT APPLICATION.

OFCOM need to actively license and manage base station transmit power, and not allow a telco to operate at the maximum permissible ERP. If this requires the telco to resite to a more suitable area, or to implement a larger number of much lower power base station Tx, then that should be an option, not 'ramp up the power as it's the cheaper solution'.

Perhaps it should be considered where appropriate to migrate some DTT to SFN working, and/or consider a more sensible approach to spectrum planning by re-arranging DTT channels. There was too much emphasis placed on ensuring DTT multiplexes remained on the old UHF TV channels in a given area, to reduce the number of people who would require an aerial change. Perhaps NOW is the time to revisit this decision. Currently, our local WEST area DTT service is provided by a local relay (low power) whose channels are all adjacent to an out of area main station transmitter in the WALES region. This causes us issues, and has done since DTT was introduced back in the on-digital era. Diabolical spectrum planning, all to save a mass aerial change

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

I believe the number of households assessed as affected is significantly underestimated, particularly as no one has any idea at this time where the proposed sites for the new 4G base stations are to be sited.

Assessments need to be done again at the point a telco requests a 4G service into an area, where all parameters can be assessed and then mitigated before implementation and roll-out.

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

Broadly, yes, however one mitigation should be to consider moving a DTT area to SFN, or moving high 50's multiplexes to lower channels.

You have identified that many DTT users may not be able to move to a different platform, but I believe you may have underestimated this number.

Perhaps part of the mitigation path should also have been for a telco to implement a 'local cable' solution to an area affected by their service. This would theoretically be an easy (though costly) proposition, but should have been considered as a mitigation. If a primary user of the spectrum (the TV License payer) is going to lose part or all of their service, then it should be a requirement of the telco to ensure that user is put back to the position they were in before the 4G rollout. Simple.

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?:

TV License payers are not going to understand why their service is going to be impacted. They were told that DTT was the way forward, and would IMPROVE their viewing experience, not suddenly to have that taken from them.

Every single license payer needs to be put back to the position they were in immediately before the implementation/switch on of the 4G service that is causing interference. There needs to be no pre-judgement by MitCo, no 'half-way house' solutions.

Use this philosophy: If by implementing the 4G service, a telco 'breaks' someone's TV coverage, they fix it at whatever cost OR the 4G service is withdrawn from that area.

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

n/a

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?:

Costs should be borne in full by the Telco's. If it proves too expensive for them, then tough!

Try explaining to an OAP, why it is more important for a spotty kid to be able to 'facebook' on his very expensive tablet whilst he is sitting on her garden wall, than her being able to enjoy Coronation Street. Because that is what it potentially boils down to. Favouring one over another.

TV is VERY important to some elements of society. The elderly, vulnerable and those with limited mobility. Mobile Voice and Data services, whilst they may be 'nice', could easily be catered for using the existing spectrum and technology. It is only the greed of the telcos that want additional market share, and the greed of the Government who see spectrum as something to sell off to the highest bidder.