

**Forename:**

Peter

**Surname:**

Rush

**Representing:**

Self

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

More research is required on how many households use amplifiers to receive DTT. for instance, I can only receive DTT at present using an amplifier (the postcode checker claims reception is not possible at all) and after DSO an amplifier is still likely to be required. note that many households will use more than one TV, and in such cases an amplifier is probably required as part of the means to split the aerial signal. So the estimates of households with an amplifier need to take this into consideration; the analysis seems to assume a single household only has one TV. since postcode checkers can be used for assessing DTT coverage, similar should be offered for assessing interference.

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

No. the analysis is clearly biased in favour of 4G services - why, for instance in Table 5.2 is the future of filters to 4G base stations not considered separately as a stand-alone solution. the basis of cost estimates for a DTT filter needs to be provided, and should include the cost of a professional installation to give a true picture of the cost that is likely to be incurred - why should the DTT householder be expected to install it themselves to correct an issue not of their making - the polluter (i.e. 4G telecom company) should pay the entire cost, it will make them think more carefully about base station siting, radiated power, aerial orientation and location of sites. for a reactive filter installation, compensation for loss of DTT, no matter how temporary, should also be payable. this is especially true as the 4G service providers can be expected to make profits well in excess of the estimated costs of filter installation.. re-orientation of aerials is not really acceptable unless the same set of channels, including regional programmes is maintained, there is no good reason for such consumers to be discriminated against.. Para 5.70 also demonstrates the bias towards 4G networks, on what basis is this bias founded on - have you, for instance, done consumer surveys to test the options of complete DTT/reduced 4G performance and vice versa to see what they prefer, or are you just determined to maximise the returns to government and 4G operators? similarly para 5.78 is ridiculous, why should someone be a) compelled to move to a new platform and then b) have to replace PVR's, etc. on top, just to please a 4G network operator? it is beyond the bounds of credibility to suggest that such kit will be replaced willingly at the consumers expense. you are not the ones to judge if a replacement platform is acceptable, it should be the

individual consumer, who should be guaranteed to be left no worse off, and at no expense to himself. It is particularly so when considering moving house, especially where the move is to an area requiring a different platform- this has been ignored in your analysis, and many people have a move forced upon them by employment issues. Consider the impact of house prices in your economic assessments, especially for the households for whom no mitigation methods will solve the issue. Incentive mechanisms on 4G providers are not the answer, a legal requirement for them to solve all issues at their expense is the only fair one., as they then can make an economic evaluation to install/not install in a specific location, thus maximising economic benefits automatically.

**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?:**

It is fundamentally unfair to consumers to expect them to spend time (even that for installing a simple filter) to fix a problem caused by someone else. The organisation causing the problem should be liable for all costs, to return a consumer to at least no worse a set of channels that they enjoyed before, and with all required recording/playback features. If a platform change (either way) is required, the costs of replacing equipment with suitable alternatives should be ongoing to cover anyone moving between such areas at any time. Only by so doing is the full economic cost of 4G highlighted, and hence 4G providers able to make bias-free decisions on coverage.

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

Poor, and clearly biased in favour of promoting 4G networks above anything other consideration, without even being honest about this intent. Why should 1000+ households who currently enjoy DTT lose it just to satisfy commercial interests. This question needs answering, but is not even asked.

**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?:**

No. See above. The polluter should pay, so all costs of interference mitigation for all time should fall on 4G providers. If no solution to the issue exists in an area, then no 4G for that area. All areas should have a trial for 1mth, during which interference issues are comprehensively logged, then mitigation applied before 4G transmissions resumed. There is no justification for consumers to be told that they will have to put up with interference for an unlimited period of time or fix it at their own expense for a timely solution, which is what your proposals amount to. Only by making the 4G providers pay for all costs is the full economic cost identified, and these companies are best placed to then decide if it is economically justified to implement 4G. They will be much better at risk assessment and quantifying it in money terms than OFCOM will ever be. No reason why all households shouldn't be visited prior to 4G introduction to determine reception availability, the parallel is changeover to natural gas which was done quite efficiently and involved all households being visited.