



**Ofcom call for inputs:**

**“Managing the effects of 700MHz clearance on PMSE and DTT viewers”**

YouView, BT and TalkTalk are aligned in the responses to this call for input.

Minimising disruption to existing DTT consumption, and avoiding a sense of panic at the potential loss of DTT channels – and therefore DTT platform churn - through clear communication and structured consumer support is vital in making the 700MHz clearance a success for DTT consumers.

We feel a well-funded information and financial support scheme for 700MHz clearance could minimise platform churn, and ensure homes continue to benefit from free to air DTT reception. Managing expectations in a clear, concise and repeatable manner; supporting consumers end to end, financial support, and minimising disruption should be the goals of the clearance programme.

We regard clearance and coexistence as different phases of the same 700MHz programme. We recommend a coordinated approach across the two phases to ensure the both are handled in the same open, informative manner with visible trials and rollout plans, allowing proactive consumer support preparation and seamless communication.

**Question 1: Do you agree with our assessment of the number of viewers that will need to retune?**

We believe the assessment is closer to 20 million within the 14-20 million range given:

- a) The number of DTT television sets and set-to-boxes in each UK home serving as primary, secondary, or even tertiary units. This will result in multiple retunes on potentially different OEM devices and DVB tuners, each with different on-screen navigations and remote-control-button presses taking consumers to retune menus
- b) Retunes resulting from any activity based on the two, interim, commercial, DVB-T2 multiplexes (COM 7 and COM 8) currently on 600MHz
- c) Trial retunes following regional testing, and subsequent rollout, may result in multiple retunes

Cross-DTT-platform collaboration would be required to ensure consistency in preparation and delivery of consumer support mechanisms, including YouView, BT-TV, TalkTalk-TV, Freeview, EE-TV, any other platforms that have not yet launch DVB enabled products (Now-TV, Vodafone-TV), vertical and horizontal sales channels, and approved aerial engineers.

**Question 2: Do you any comments on how viewers will find the retuning process and whether there are particular groups of viewers which will require greater consideration/assistance with the process? What help might they need?**

Given the experience of the 800MHz clearance for Digital Switchover (DSO), and smaller scale Logical Channel Number (LCN) changes since DSO, the notion of retuning is well understood by most technologically-savvy households.

To ensure maximum message penetration, direct, tailored and targeted messaging is recommended utilising multiple communication channels including letters and flyers; dedicated, single-issue (700 MHz) contact centres, which should build on the successes of the DSO clearance and at800 coexistence programme in an aligned and coordinated way; website and postcode checker; social media; broadcast stream on-screen MHEG messages; and, if possible, targeted Network Change Notify Descriptors to allow compatible devices to respond to retune triggers. We are satisfied that stakeholders will need to agree on exact communication channels at a later date in the programme.

We would expect the communication campaign to start well before the clearance, continue throughout clearance, and provide post-clearance support. Following DSO there were challenges with the 4G coexistence phase, specifically with the visibility of 4G rollout plans across mobile sites for TV platform operators. We regard clearance and coexistence as different phases of the same 700MHz programme, and recommend a coordinated approach across the two phases to ensure the both are handled in the same open, informative manner with visible trials and rollout plans, allowing proactive consumer support preparation and seamless communication.

The accessibility, elderly, and low income demographics would need additional support and should be especially catered for, and similar to our response to Question 10, to prevent scam activity from opportunists.

Multi-region homes which can potentially tune into more than one transmitter or TV region may need additional support to tune into the correct region or transmitter.

Homes requiring wide-band aerials to replace narrow band aerials, or homes requiring existing aerials to be repointed will need timely support and prompt resolution via specialist aerial engineers to prevent dissatisfaction or, in the worst case, platform churn.

Social media is a newer communication and support channel, and one that was not in common use around the time of DSO. It is important to establish an official online forum and Twitter feed otherwise it will be set up by someone else in an unofficial capacity and it will be become challenging to manage messaging on these channels.

***Question 3: Do you have any information to suggest that our estimate for the number of households that will need to replace their aerials should be different?***

We do not have additional empirical data which indicates whether this estimate is accurate.

Only a test phase in a representative, metropolitan region can produce enough sample data which could be extrapolated to estimate the overall national impact. We urge the planning and execution of a test phase to not only produce a strong set of test results which would give us confidence about the scope and impact of clearance, but also allows the staging of communication, support and resolution processes for homes within that region. This will ensure the proposed consumer support processes are refined, and become highly effective and efficient prior to ongoing rollout.

We are not proposing a lengthy test phase; it should be rapidly planned and executed this calendar year to order that it remains consistent with the proposed timeframes for the overall programme, and does not adversely impact the overall programme duration.

***Question 4: Do you have any information relevant to our assessment of the average cost of an aerial replacement?***

Average aerial installations are within the £120-£150 range, with higher end prices for masthead amplifiers, chimney installs and complex fixtures and fittings.

***Question 5: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial replacement?***

£150 is a considered cost. It is more than the cost of some new set top boxes, and most consumers would regard having to pay up to £150 as a result of a government policy decision to sell spectrum to mobile network operators as unacceptable. Ultimately, there is no value-add for these consumers in purchasing a new aerial installation; just a retention of previously accessible free to air DTT. If households decide to opt for cheaper in-door, set-top, or loft aerials then may suffer from poorer reception and signal quality resulting in picture pixilation or occasional blank screens.

A £150 expenditure for some households would need to be planned for and saved for. Surprised by the sudden loss of DTT as the trigger for a new aerial installation, some households may need to need to wait for the medium term before a purchase is affordable. Even for a well-planned spectrum clearance, costs and cases like this would create damaging public complaints which could be cited in the press, or accelerate through social media at a rapid rate.

***Question 6: Do you have any information to suggest that our estimate of the number of viewers that may need to repoint their aerials should be different?***

We do not have additional empirical data which indicates whether this estimate is accurate.

Only a test phase in a representative, metropolitan region can produce enough sample data which could be extrapolated to estimate the overall national impact. We urge the planning and execution of a test phase to not only produce a strong set of test results which would give us confidence about the scope and impact of clearance, but also allows the staging of communication, support and resolution processes for homes within that region. This will ensure the proposed consumer support processes are refined, and become highly effective and efficient prior to ongoing rollout.

We are not proposing a lengthy test phase; it should be rapidly planned and executed this calendar year to order that it remains consistent with the proposed timeframes for the overall programme, and does not adversely impact the overall programme duration.

***Question 7: Do you have any information relevant to our estimate of the cost of aerial reprints or platform changes?***

Average, basic aerial reprints are around £50. Higher end prices exist for scaffolding and additional labour for complex environments.

***Question 8: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial reprint or platform change?***

Similar to Questions 5, we believe some consumers will regard even this smaller outlay as unacceptable. For the small number of homes that find themselves unable to restore DTT signal via a replacement aerial or repoint, the costs of moving to a digital satellite or cable TV platform would be prohibitive. The average price for a Freesat device and install is upwards of £220, and some elderly or vulnerable groups – who already receive assistance, reductions or concessions for other consumer services - may find this prohibitively expensive. These groups should benefit from a similar financial support scheme for 700Mhz, as well as support to prevent activity from opportunists citing 700Mhz as part of a dishonest scam.

***Question 9: Are there any other matters the consumer support scheme should cover?***

We believe the funding should be provided by Government.

[The HM Treasury's Spending Review and Autumn Statement 2015](#) stated the following from which we believe a proportion should be used to manage the effects of the programme:

*2.103: Up to £550 million will be invested over the Parliament to make the 700MHz spectrum band available for mobile broadband use.*

**Question 10: Are there any other elements a consumer information campaign would need to include? Do you have any comments on or further evidence to inform the above estimates of the cost of providing information and advice to viewers? Please provide supporting evidence for any adjustments that you think may be relevant.**

Similar to Question 2, a multi-channel communication programme pre-, during, and post- the clearance is our preference, coupled with a very clear, transparent, tracked rollout programme that allows support and vigilance to be proactively heightened region-by-region. . It would also be helpful to link this with the later coexistence phase.

We would urge a support programme based on the specific details of the 700MHz clearance handling all the permutation and combinations of retune, aerial replacement and aerial repoint. Additionally, the consumer support scheme needs to accurately triage and describe the path that leads to aerial repoint and aerial replacement. There are always opportunists who will use any confusion around aerial work to initiate scam activity and needlessly recommend and execute aerial works, usually at a higher than average cost. Ensuring there is an officially sanctioned public communication plan and contact centre helps reduce this risk.

**Question 11: Do you have any comments on information which is relevant to our assessment of the potential costs of administering a help scheme?**

We would assume costs based on DSO and 800MHz clearance and the subsequent 4G rollout programme, plus subsidies for aerial replacements and aerial repoints, and filters and attenuator, but we recognise ultimately 700Mhz differs in overall scale and impact.

**Question 12: Do you have any further evidence to further inform our assessment of the likelihood of viewers that suffer from un-related pre-existing reception problems erroneously making claims against a 700MHz help scheme?**

Whilst poor or lost DTT signal can be attributed to a range of factors including weather, reduced transmitter power, lead or connector issues, nearby obstructions, or in-home impulse interference, there are a number of common triage steps that can be taken to establish the root-cause of poor or lost DTT signal.

We use [help videos](#), [FAQs](#) and agent training to triage and resolve issues for consumers.

For the 700MHz clearance, we urge a robust and varied set of techniques to check for genuine issues, including:

- Trials phases: Similar to Questions 3 and 6 in order to understand more about the signs and indicators related to 700MHz clearance
- Call centre Q&A by trained agents to identify non-genuine cases
- Installation engineers who can evaluate genuine local issues in-situ

**Question 13: Do you have any additional information to further inform our cost estimates and assumptions of the effectiveness for the different triage methods?**

**Are there any other triage methods which should be considered? Please provide supporting evidence for any adjustments you think may be relevant to our current estimates?**

A central role is important for a programme of this scale. Given Digital UK's experience of managing a DTT support and advisory service for DSO, Digital UK could potentially act as the consumer support coordinator, working with all the other parties identified in Question 1 to ensure a well-connected, collaborative support programme for the pre-clearance, and clearance, phases.

Post clearance should include the later phases when the cleared spectrum is rolled out for mobile data usage. If it is established by OFCOM that there is a material risk of interference issues arising, then this may require a similar approach to 800Mhz coexistence where the mobile industry was integral to the process to manage and deal with any interference issues that arise.