

Communications Consumer Panel response to Ofcom consultation

Coexistence of new services in the 800 MHz band with digital terrestrial television

The Communications Consumer Panel (CCP) welcomes Ofcom's consultation into the possible impact that new, 4G mobile services may have on DTT viewers. The next generation of mobile services will bring with them many benefits, and it is important that we maximise these new resources for consumers. However, it is vital that any potential problems for existing DTT viewers are identified and consumers and citizens protected.

The CCP notes that, as outlined in the consultation, if new licensees in the 800 MHz band were to roll out new mobile services and no action was taken to manage the interference risk, up to 760,000 DTT consumers could be affected. This could mean lost reception of one or more DTT television channels, either for some or all of the time or, at worst, lost reception of all DTT TV channels.

The CCP also notes that it is difficult to predict exactly which households will be affected in advance. Moreover, 4G services are likely to be added over an extended period, rather than at a single point in time, meaning that the numbers of households affected will not necessarily be static.

The release of the 800MHz spectrum will be of benefit to mobile users. Some of these mobile users may, or may not, be the same people affected by interference to the DTT signal. According to Ofcom data from quarter 1 2011, 33% of UK adults class the Freeview service on the DTT platform as their main type of television. This is more likely among older viewers (particularly those aged 65+), disabled people, and those in socio-economic groups DE¹. Indeed, Freeview is the most popular method for receiving a main TV service among people in these groups. In terms of the value that people attach to this, watching television is considered by the general UK population as the medium people would miss the most if it was not available. Older viewers, disabled people, and those in socio-economic groups DE are more likely to say this².

The underlying principle

The underlying principle of intervention should, the CCP suggests, be that viewers who currently receive a DTT service will continue to do so or be enabled to access an equivalent service following the rollout of new 4G services. It is important that those people affected by interference to their DTT signal are not made to bear the cost of rectifying the issue.

The consultation outlines two broad types of consumer-based measures for dealing with interference:

¹ [Ofcom's Technology Tracker Q1 2011](#)

² [Ofcom Adults' Media Literacy Audit 2010](#)

- Measures that restore DTT services, eg DTT receiver filtering and Re-orientating DTT aerials.
- Measures that restore TV services, but do not restore DTT channels eg platform change such as converting to freesat.

Costs and detriment

The Panel notes that the Consultation states “We propose that the costs of creating this body and the work that it carries out should be borne **predominantly** by the new licensees of the 800 MHz spectrum.” (our emphasis). The Panel would appreciate clarification of this statement so that it is clear that no costs in relation to this body or the work it undertakes should be borne by consumers.

While the Panel recognises that DTT planning is based on an assumption that all TV installations have a roof-top aerial, it is disproportionate to argue that households who do not have a ‘standard quality’ installation, and **currently** receive DTT services, should be responsible for fixing the problem of interference themselves. Similarly, the specific channels lost should not be a factor in deciding the level of support available - all consumers are unlikely to share the same assessment of which channels they value the most and it would be a retrograde step to, for example, force those who wished to watch non-PSB channels that were no longer receivable to fund installation or platform change themselves.

The consultation rightly references the non-cash implications of the likely interference issues and the measures needed to rectify them - the consumer time to identify and understand the issue, and the time and inconvenience associated with mitigation measures, e.g. in fitting a receiver filter or arranging platform change. If the likelihood of interference is not established prior to the rollout of new services, there is also the question of the detriment that would be experienced from the loss of channels while the problem is being rectified - potentially over a sustained period. These are of particular concern in the case of older and disabled consumers. These challenges should not be underestimated.

Awareness and advice

UK consumers have recently, or are about to, experience digital switchover - it is important that information about interference issues is clearly delineated from switchover messages to avoid consumer confusion. The Panel would also encourage the consideration of UK-wide awareness raising of the issues that are likely to occur - and the solutions - well in advance of any network roll-out, followed by targeted information campaigns in advance of roll-out in any given area. In its consideration of the Digital Switchover process, the Panel identified ‘hard to reach’ members of society as the group most at risk, as they are not only vulnerable but also more likely to be on the margins of society and less likely to have a network of friends and relatives to help them. These people are less likely to pick up on information about possible interference and even less likely to be able to use telephone or web-based helplines. As part of the Digital Switchover process, Digital UK developed partnerships with organisations, such as social services, in order to identify and contact the hard to reach. The Panel would encourage the emulation of this approach.

The CCP recognises that it is important that consumer support provisions are proportionate. It agrees that it is vital that information and advice are provided to consumers and that this is likely, at a minimum, to require the provision of a telephone help-line and a dedicated website. However, the Panel would warn against over-reliance on web provision and stresses the need for adequate telephone support.

Timing

The Panel is concerned that the consultation assumes, for the purpose of cost estimate, “that standard households are sent filters in advance of new network switch-on, whereas households using communal aerial systems or domestic installations with amplifiers have filters installed after interference has occurred.” The estimated 550,000 households with communal aerial systems, be they residential homes or flats, in addition to the estimated 100,000 households with domestic installations with amplifiers appear to be more likely than standard households to suffer detriment on the basis of this assumption. While recognising the cost associated with proactively supplying affected consumers in all situations with DTT filters, it would appear to be unfair to ask consumers to lose DTT services whilst they waited to see if they experienced interference and - should they then identify it correctly - then wait further while they took the necessary action to request and install (or have installed) the filter before regaining their services. The Panel would therefore advocate the early testing of equipment to alert people to the likelihood of their experiencing interference when new services commence and allow the necessary remedial action to commence.

If staged mediation is considered to be acceptable, and it is not possible to alert consumers to any specific interference issues before roll-out, the Panel would stress the importance of consumer awareness of the issue more generally, so that people do not make hasty, ill-informed decisions and incur unnecessary costs in order to restore their service. As previously noted, this is of particular concern for older and disabled consumers.

Installation

The consultation assumes “that households with standard domestic installations would in 80% of cases be able to self-install filters as the filters can be installed either near the STB or IDTV.” The CCP is reassured to note that the consultation acknowledges that “Old or disabled consumers may find this challenging, and some additional support for these consumers may be appropriate.” But the Panel strongly suggests that additional support must be available in these circumstances.

Platform change

The CCP notes that an estimated 30,000 platform changes may be necessary where DTT receiver and base station transmit filtering do not resolve the interference issues. In the Panel’s opinion, consumers in this situation particularly must be alerted well in advance of the roll-out of new services, and be given the ability to arrange priority installation of the new platform beforehand, so that they do not experience a loss of channels whilst waiting to be connected to the new platform post-interference issues. The provision of an alternative service, equivalent to that available on DTT, should be provided at no cost - initial or ongoing - to the consumer.

The last 3%

The Panel is also interested to know more about the support that will be offered to the households where the DTT service cannot be restored and where no alternative platform is available (noting that the estimated 3% among those remaining affected households is an upper estimate and that there “is significant uncertainty surrounding this figure”).

Working in partnership

The Panel looks forward to the publication of the team’s further work on consumer issues, later this Summer. To maintain a focus on the needs of consumers, the CCP encourages Ofcom to continue engaging with the Panel as this project develops. It would also suggest that Ofcom liaises with the Consumer Expert Group to share the experience this group has developed during digital television switchover.

In summary, the Panel:

- believes that new 4G services will be of benefit to mobile users;
- notes that DTT is a popular platform via which valued TV services are received;
- advocates that viewers who currently receive a DTT service should continue to do so or be enabled to access an equivalent service following the rollout of new 4G services;
- believes that people affected by interference to their DTT signal should not be made to bear the cost of rectifying the issue;
- notes that the non-cash implications of the likely interference issues and the measures needed to rectify them should not be underestimated;
- encourages the consideration of UK-wide awareness raising of the issues that are likely to occur - and the solutions - well in advance of any network roll-out, followed by targeted information campaigns in advance of roll-out in any given area. These must be clearly delineated from switchover messages;
- encourages the provision of clear, comprehensive advice which is easily accessible by all;
- urges the provision of appropriate advice and support - particularly for older, disabled and ‘hard to reach’ consumers;
- advocates the early testing of equipment to alert people to the likelihood of their experiencing interference when new services commence and allow the necessary remedial action to start; and
- encourages a partnership approach to this issue.