

Name withheld 1

Additional comments:

Question 7.1: Do you agree that it is best to seek to establish MitCo in advance of the auction for later transferral to 800 MHz licensees?:

Yes: If the provision of filters is intended to be "pro-active" the set-up of Mitco needs to be well advanced before LTE services can be rolled out. Assuming that filters were mailed out a month before switch-on in a specific area these would need to have been ordered 3-4 months in advance. Prior to this an assessment of the performance of the various options available to Mitco would need to have been reviewed and decisions made about preferred suppliers. In my opinion the procurement process needs to have started at least 6 months prior to the envisaged launch of the new service. Making these decisions later than this is likely to cost Mitco and therefore its stakeholders a significant premium by limiting choice at the outset and potentially incurring costs in order to expedite the process.

Alternatively an independent specialist could initiate the procurement process on behalf of Mitco passing their conclusions on to the company when ready or alternatively being absorbed into the company when it is formed. At present the development of suitable products is being left to those manufacturers with an awareness of the requirements and commercial focus on this business sector and not necessarily the best or most competitive long term suppliers.

Question 7.2: Do you agree with our initial views on MitCo?s constitution and governance?:

Yes

Question 7.3: Do you have any views on the proposed approach to the Supervisory Board.:

No

Question 7.4:We propose that the 50 gain share be split between 800 MHz licensees based on the volume of spectrum they hold in the 800 MHz band. Do you have any comments on this proposal?:

No

Question 7.5: Are the information parameters defined above and in Annex 5 sufficient to allow MitCo to accurately and reliably forecast the scale and scope of households affected by DTT interference?:

Only the "real world" tests can assess this but if they are fed back in to refine the process as the project rolls out this should ensure continuous improvement.

Question 7.6: Do you agree the KPIs related to MitCo's activities are appropriate and robust?:

In the KPI's there appears to be an assumption that providing a filter that can be fitted by a consumer will achieve the objective of mitigating interference, however in the breakdown of the potential 2.3M affected households and the preceding Ofcom technical report there are 2 situations where this is acknowledged as unlikely.

First: On dwellings where the DTT signal is fed from a Communal Aerial System it was suggested that a much higher quality filter would need to be professionally installed within the system to prevent interference being generated inside the system equipment prior to being delivered to each dwelling. Communal Aerial Systems account for a projected 950,000 of the projected 2.3M households.

Second: Domestic installations with amplifiers where it is acknowledged that a filter may need to be fitted before the DTT signal is amplified in order to cure the interference. This throws up the potential issue that this may require the filter being fitted in the loft or on the aerial mast if a masthead amp is fitted. Domestic installations with an amplifier account for a further 940,000 of the projected 2.3M households and potentially 50% of these may be too difficult for consumers to access.

The KPI measures whether a filter has been provided or not but there is no KPI established to measure whether this is sufficient to achieve objective of mitigating interference. There needs to be a process by which the effectiveness of the proposed solution is measured against the level of complaints received and a mechanism to adapt the solutions that are being provided in order to meet the objective.

Where it is acknowledged that a filter does not cure interference another KPI has been established to perform a platform change within 8 working days. This is potentially a very expensive process and may leave the householder with 2 out of the average 3 TV's in their home blighted. A professional installer may be able to cure the problem with an amplifier or on a communal system far more cheaply than providing a platform change. There needs to be an intermediate stage between a filter supplied through the post and a platform change. There is no budget to switch a large number of households onto a different platform.

Finally, there is no allowance within the KPI for the fact that access to communal aerial systems may infringe maintenance contracts or require permission from the landlord.

Question 7.7: Do you agree that the KPI for incentivising and measuring the proactive supply of DTT receiver filters to households affected by interference should be based on an assessment of the outcomes rather than the activities performed by MitCo?:

Yes

Question 7.8: Do you agree with the approach we have outlined for incentivising KPI achievement and managing cases of non-compliance with KPIs?:

Question 7.9: Do you agree with our proposed approach for managing MitCo's performance against other elements of service delivery that are not captured by KPIs?:

Question 7.10: Do you think a hard or soft limit should be set in relation to platform changes? Do you have any other comments in relation to the platform change cap?:

If a platform change is the only alternative to a filter supplied through the post being the cure for interference then I have highlighted two situations where this may cause problems. Capping platform changes may be an option but only if there were a cheaper intermediate step to resolve the interference problems without a platform change especially on Communal TV Systems and Domestic Installations with an Amplifier.

Question 7.11: Do you agree with the requirements we propose to place on licensees to address interference after MitCo closes?:

Question 8.1: Do you have any views on the nature or detail of the requirements we propose may be necessary as set out in this Section?: