Additional comments:

The existing equipment using this band comprises of television, set top boxes and satellite receivers, served by individual aerials or communal aerials ./ MATV / SMATV / CATV networks.

There has been very little investigation into the numerous interference issues with the CEPT work.

In addition, there has not been an impact assessment conducted which, we believe, is essential and should take account of the costs of resolving the interference issues including the replacement of equipment and the addition of filters.

Because the interference issues will be significant we believe that the provision of filters and replacement of equipment should be on a proactive basis not reactive.

It is important that should block edge masks be used, they must ensure full protection of existing users.

A final note relating to our submission should be that the Confederation members, are all the companies in the UK involved in the manufacture, installation and maintenance of terrestrial, satellite television and radio reception. For the purposes of this submission it should also be noted that there are some 10,000,000 persons receiving signals via a cable / communal system

Question 1: Do you have any comments on the application of the protection clause to all new licences for the 600 MHz band and geographic interleaved spectrum?:

The protection clause must ensure that the cost of compensation or replacement domestic and professional equipment displaced or interfered with is covered by the licence holder.

Question 2: Do you have any comments on our approach to technical licence conditions for the 600 MHz band and geographic interleaved spectrum?:

Yes, comprehensive out of band and spurious limits in line with the existing broadcast band limits must be observed unlike the situation that has been allowed with the 790-862MHz band. Consideration of the proposed power limits on existing communal aerial and cable networks should be, must be a priority.

Question 3: Do you have any evidence using frequency offsets with DVB-T2 EC signals might have an adverse impact on uses of adjacent interleaved spectrum?:

Please refer to the Cable Europe Test reports, which indicate that it is the customer premises equipment which has the problem,

In the case of communal aerial systems the interference will be into the head end and floor level distribution amplifiers, in addition to proximity of new terminal units to existing TVs etc.

In the case of domestic installations using mast head or head end amplifiers the interference will be generated within the aerial/amplifier combination and on some occasions will be generated with both set top boxes and satellite receivers UHF inputs.

All of the above are covered in published reports.

Question 4 Do you have any evidence mobile services using the 600 MHz band and geographic interleaved spectrum could cause harmful interference to cable television?:

Question 5: Do you have any comments on protecting PMSE in channel 38?:

As stated previously this channel should be protected by strict out of band and spurious limits

Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?:

The wording should protect adjacent channels and other users. Provision of support to end users should interference be experienced and the radio investigation service charge should be waived

Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?:

Question 8: Are there any distinctive considerations and uses for this spectrum in the nations and regions of the UK?:

Radio microphones

Question 9: Do you have any comments on our continued inclusion of channel 36 in the award of the 600 MHz band?:

Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?:

It is essential that an impact assessment is carried out prior to the licence being granted.

Question 11: What information can you provide on packaging and award design considerations?:

Question 12: When would you like to start operating new services using the 600 MHz band and/or geographic interleaved spectrum?:

After 2015