

**Title:**

Mr

**Forename:**

Tim

**Surname:**

Jenks

**Representing:**

Organisation

**Organisation (if applicable):**

Confederation of Aerial Industries Ltd (CAI)

**Email:**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

The CAI Board of Directors has instructed me to respond on its behalf. However the views expressed here may not be a 100% representation of all individuals on that Board.

**Question 1:Are there areas of Ofcom's overall strategic approaches and purposes (outlined in paragraphs 2.4 to 2.10 above) that may need to change?:**

No, but by far the most important and far-reaching areas of future strategy is the use of UHF spectrum beyond the long held capacity for TV, radio and other content delivery.

**Question 2:What are the issues and areas that should form Ofcom's priorities or major work areas in 2015/16?:**

2.6 In light of the lengthy debate over optimal spectrum use the CAI believes there needs to be a firm regulatory touch on the development of UHF spectrum.

It is not in the interests of the majority to allow spectrum to be occupied by content that is driven purely for the highest revenue.

Similar arguments delivered in favour of the maintenance of Licence Fee supported TV and Radio can be applied to the giving over of spectrum simply for more broadband bandwidth. i.e. what delivers more cash may not be in the best interests of the nation's welfare.

The complete commercialisation of UHF spectrum under the banner of 'more communication capacity' is not necessarily for the best.

2.7 It can be argued there is too much emphasis on wider communication. The argument being it makes life easier. The counter argument would be that more communication is simply increasing workloads and lengthening working days.

Erosion of broadcast spectrum and at the expense of passive entertainment and leisure may not yield the best result. Not all progress is good progress.

Where there is strong case for migration of TV to other areas of the spectrum the CAI wants to see public support by OFCOM for the standards it puts in place for compliant equipment. (i.e. benchmarks & specifications).

**Question 3:Are there any specific areas for deregulation or simplification in the coming year?:**

There could be a case for revisiting the definitions that are many and varied surrounding 'aerials' and 'antennas' in relation to planning regulations. There is evidence of confusion with regards to the 'de minimis' approach to terrestrial TV reception and the complex controls on satellite (direct-to-home) installations. This particularly confusing when dealing with commercial and multi-dwelling scenarios.