

**From:** [do\\_not\\_reply@squiz.net](mailto:do_not_reply@squiz.net)  
**To:** [UHF-SI](#)  
**Subject:** EXTERNAL: Consultation response: PMSE clearing the 700 MHz band: Support for PMSE equipment owners  
**Date:** 13 July 2017 16:59:15

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Response:

**Your details**

Full name: Katie Worsick  
Representing: Organisation  
Contact phone number:  
Organisation (Optional): Wigwam Acoustics  
Email address:

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**Your response**

Question 1: Do you agree with Not completely, no. I can see that there are users whose equipment is used in one specific location who would find themselves no longer able to use equipment which primarily tunes below 694MHz due to DTV being moved into its tuning range. Or they may find they can use a smaller quantity of their equipment at the same time than they could

our proposed criteria for who should be eligible for the grant scheme?:

before. Additionally, I think there needs to be further clarification about equipment which transmits on one frequency above 694MHz but receives on another below it and vice versa. We have wireless communications kit which fits into this category and I am concerned that although we may receive an element of residual funding for the beltacks, which transmit above 694MHz, we would receive nothing for the base station, which transmits below 694Mhz (but receives above 694Mhz), which would obviously be rendered useless by having no beltacks with which to operate.

Question 2: Do you agree with our assessment of the impact clearance will have on equipment which operates exclusively below 694 MHz?:

No (see above)

Question 3: Do you agree with our analysis of the impact clearance will have on equipment which straddles the 700 MHz band and the spectrum below 694 MHz?:

As part of the stated intention of the early clearing of 700MHz is that PMSE will not be left any worse off, then any equipment which has its available tuning range reduced due to the change will be less useful and therefore render the PMSE user "worse off" due to having less available spectrum in which to tune the equipment.

Question 4: Do you have any evidence that an alternative boundary for the tuning range of equipment should be drawn?:

In the channel 69 clearance, we were given the option as to whether we surrendered equipment or not (due to the fact that some could have still be used licence-free in channel 70). I believe this should be used in this case as well and that owners of any equipment that tunes even partly above 694MHz should be given the choice whether to surrender the equipment for funding as part of the scheme.

Question 5: Do you agree with the proposed formula to estimate the level of funding?:

Absolutely not. As a hire company we are able to command the same level of hire income for items whether they are brand new or several years old and therefore only receiving a residual value for them is complete nonsense. Using the previously mentioned wireless comms as an example - they are over a decade old but yet we have not reduced the hire tariff in that decade and they are one of our most popular hire products. Additionally, over the last few years, we have spent several thousand pounds refurbishing the beltacks so that they look "good as new". Under this scheme we would receive very little for them and therefore lose an income stream due to potentially not having enough money to replace them.

The asset life is largely irrelevant as I believe that full replacement value

Question 6: Do you agree with our approach to calculating asset life?:

should be awarded, otherwise the assertion that PMSE will not be worse off cannot be upheld. This isn't greed, this is due to the fact that the hire value of an item does not depreciate and we will be unable to replace our hire fleet to full quantity without proper funding. Additionally you state that: "4.8 We found that, on average, PMSE equipment owners estimated the lives of their equipment to be 16.8 years. On the other hand, equipment manufacturers stated that equipment had a life of either 10 or 20 years." And conclude that 15 years is average, thereby completely ignoring the 16.8 year estimate. At least look at it being 15.9 years!!

Question 7: Are you aware of any developments which would mean data from the 2013 equipment survey or the 2010 Channel 69 statement are likely to misrepresent average asset life?:

No, but I would like to pick up on one section: You state this: 4.16 .... If we assume that ... PMSE equipment owners have not materially expanded their stocks of equipment since 2013 That is utterly ridiculous! Speaking from personal experience we have probably doubled our wireless equipment stocks in the last 4 years!! The growth within the hire industry has been massive and some of that equipment we have bought will, out of necessity, have been in 700MHz band. This is a still-growing industry.

Question 8: Do you agree with the use of an average asset age for the estimation of funding entitlements? If not, do you have any suggestions for an alternative approach?:

The alternative approach I would suggest is to supply the full replacement value as you did with the channel 69 funding. Anything less will be massively detrimental to the industry.

Question 9: Are we correct in our assumption that a large proportion of PMSE equipment owners will not have evidence of when they purchased their equipment?:

Yes

Question 10: Do the data in the 2013 equipment

survey provide a reasonable basis for calculating average equipment age? If not do you have an alternative approach for gathering relevant data for making this calculation?:

I think the age should be calculated from when the 700MHz clearance is started (2018?) not when it concludes in 2020 as we will have start phasing equipment out at that stage. For example we could not send it out on a 12-month tour knowing that part way through we'd have to swap it for something else.

Question 11: Do you have any comments on our proposals for how the claims handling process should operate?:

The method could cause cash-flow issues for many PMSE users, having to surrender equipment before receiving the money to buy replacements. I don't know if it would be possible, but perhaps the "verifiers" could go to the users locations to verify the equipment and then the equipment could be surrendered once funding had been received to replace it. Once again I refer to the fact that we have been told we will not be adversely affected by the process. i know from last time that it was massively laborious process and cost the company immeasurable man hours.