



Together / The Community Channel
Finsbury Business Centre
40 Bowling Green Lane
London

Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

12 February 2019

Dear Sir or Madam,

We are responding in relation to the proposed approach to DTT use of the 700 MHz duplex gap after the award. This is set out in Section 10 of the consultation. Our views are as follows:

Re: Consultation: Award of the 700 MHz and 3.6-3.8 GHz spectrum bands

Thank you for publishing the consultation regarding the allocation of the 700 MHz bands. As one of the many channels that broadcasts on the T2 capacity, the outcome of this consultation is critical to our future and continued operation.

Together is the UK's only national TV channel dedicated to motivating viewers to make a change in their lives and to support others, and we are the world's only cooperative, charitable TV channel owned as a Community Benefit Society.

We have been on Freeview since its launch in 2002 (under our old identity Community Channel) and we use entertaining content to inspire people to change their lives, working with public service broadcasters, platform operators, channel groups, print groups and web giants and national charity campaigns. We have trustees on our board representing the BBC, Channel 4, Viacom, Sky and Arqiva, along with three trustees elected from our membership and others from the third sector.

Freeview is a growing audience for us and delivers over 40% of our viewership. Losing our Freeview capacity would result in an unsustainable loss of advertising income – along with audience reach and impact – and result in our closure.

We are encouraged by your indications that the DTT capacity we use could continue beyond 20 June 2020 utilising duplex gap spectrum. This will enable us to continue to reach millions of viewers each month, drive our social impact and deliver our charitable objects.

More widely it will enable over 20 channels to continue broadcasting and sustain the rich variety of programming available to free-to-air homes. Losing twenty channels in one fell swoop will have a severe and winnowing effect on Freeview's proposition and offer, and act as a disincentive for households to upgrade to HD receivers. It will disproportionately effect consumer choice in lower-income homes who are not able to afford pay TV.

[✂ Redacted for publication]

The continued provision of this DTT capacity is welcome, however some of the conditions attached to this will make it hard to operate. This is namely the one month rolling notice provision, which is not manageable in terms of changing our supplier agreements (e.g. playout and transmission, EPGs), our commercial partners (sponsors, airtime sales, advertising agency sales) or communications management to our owners, viewers and

stakeholders. Our contracts are anywhere from 1-5 years and so a notice period of at least 12 months would be required for us to exit some of them in an orderly way.

Additionally, this duplex gap spectrum would need to be tested to ensure there is no interference from other signals, and that signal strength and coverage replace the existing service on a like-for-like basis, as we have experienced notably adverse impact from mast closures and spectrum reallocation over the last 18 months.

It is also not a certainty that the auction of the 700 MHz spectrum will be to a telco that has a clear plan or model to monetise the additional bandwidth. Mobile service providers should have demonstrably viable products, handsets and plans that can utilise frequencies ahead of any channel closures as it feels as winning this spectrum will result in the loss of 20+ operating and viable TV channels if there is no other Freeview SD or HD capacity available. This will result in under-use or no use of valuable frequencies during the (years?) it takes to launch new mobile products and services. This will obviously be harmful to the channels affected and also offers a poor consumer experience as services they know, like and rely on are closed for no clear reason. It will also undermine public opinion and confidence in the Freeview platform.

As such following the auction we would like Ofcom to assess if the strength of the bids warrants immediate reallocation of the spectrum or if the TV services could continue (with Arqiva effectively subcontracting from the telco) until new mobile services are ready to launch. Alternatively there could be engineering solutions to use improve compression technology, 'gap' technologies or leverage other infrastructure (other frequency ranges, mast footprints) to replicate the TV capacity that is being lost.

We understand the Ofcom needs to balance the requirements of different sectors in the telecoms and media space and needs to adhere to wider EU legislation presently.

We would like to request that Ofcom remains pragmatic and flexible around the implementation of the 700 MHz, in particular the duplex gap and any actions that take channels off air unnecessarily. Together is one of a handful of independent TV channels on Freeview and we believe there are several examples of innovative and creative UK channels that have launched in recent years that provide real value as part of the TV ecosystem and creative industries. This space is increasingly dominated by global, largely American, TV networks and technology companies.

We think Ofcom should do all it can to support the free TV offer, fulfilling its regulatory duties and also a duty to ensure fair access to media in terms of consumer choice and that the public can access plurality of opinions and views.

Yours faithfully,



Alexander Kann
Chief Executive
Together (The Community Channel)