

Scottish Broadcasting Company

David Henry

Do you have any comments on our proposals?

Yes. Scotland has a need for more media voices and has terrestrial transmission issues that are unique to the Scottish landscape and difficulties in receiving broadcast television signals. Many non urban areas have access to only a couple of Public Service DTT muxes and so do not get a wide range of channels. Ofcom has a Statutory Duty to protect competition and to act when Media Plurality is likely to be damaged. 2 Local TV licenses have been identified in the consultation. Inverness and Forth Valley, these should not be included in this consultation and should be re advertised later this year with a view to allowing them to be added to the 5 local TV licenses already issued and currently used to deliver STV2.

The local terrain should not mean that citizens should be discriminated against. The actual cost for adding the transmission equipment is not that considerable. Comux has built a centralised playout and muxing solution this is not the most cost effective solution. An alternative solution for the Scottish based Local TV muxes would be to decentralise the network and allow DTH deliver to each of the transmitter sites. This is not only more cost effective but will allow the Scottish Local TV network of services to reduce operational costs and deliver the service to more homes/viewers. Comux has failed to appreciate the requirement for self help transmissions and relay muxes. These would help extend the coverage and help support the UK government policy to extend the Media Plurality. In short Ofcom should remove the restriction on the 2 Scottish Local TV Licenses and allow the 2 licenses to be re advertised.