#### **Additional comments:**

## Question 1: Have we correctly identified and characterised the potential costs set out above, and what other costs ? if any ? should be taken into account in our assessment?:

If you are again moving PMSE use then a compensation scheme should be set up to allow licence holders to ensure large capital equipment spend is not wasted and so detriment to their business.

# Question 2: What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential costs? Please identify any sources of specific evidence to which we should have regard.:

The model used for Ch69 withdrawal on PMSE should be set up and used again, possibly widening to account for all forms of equipment in use.

## Question 3: Have we correctly identified and characterised the potential benefits set out above, and what other benefits ? if any ? should be taken into account in our assessment? :

Given the lower than expected revenue achieved at the last spectrum auction - due to lack of take up of mobile operators - I would suggest that, while not abandoning the project, timescales should be more into the future, say 2020 and beyond.

# Question 4: What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential benefits? Please identify any sources of specific evidence to which we should have regard. :

As most PMSE use is locational and low power don't assume the frequencies available are not used. Not only with JFMG databases but with on site monitoring (Baldock) usage data should be gathered. Go to a cup final, F1 at Silverstone or the Commonwealth games in 2014 and see how much is relied on the use of this spectrum

## Question 5: In particular, what is your view of the likely future demand for additional sub 1 GHz spectrum for the provision of mobile data services, and what evidence supports this view?:

Don't keep giving away spectrum. Push the users to use more efficient technology to achieve the same data capacity with the current spectrum.

#### Question 6: Should we place different weights on some costs and benefits than on others, for example depending on whether costs would be borne by consumers, DTT operators, or mobile operators? :

You should stop trying to raise quick revenue for the treasury and look at the impact on small to medium businesses and there customer base.

### Question 7: Do you have any other comments on the work we are currently undertaking on potential costs and benefits? :

All you seem to want to do is keep raising revenue for the treasury and let businesses and customers pay for it. Hardly seems a good business model to me!

Question 8: Have we correctly identified the costs and benefits that could vary depending on the timing of release, and the impact of those factors? Are there other costs and benefits which would vary depending on the timing of release of the 700 MHz band which we should take into account?:

n/a

Question 9: How quickly could the 700 MHz band be released? What would be the impact on DTT infrastructure costs of releasing at the earliest possible time compared to a later time? What would be the factors which affect these costs?:

n/a

# Question 10: How, and to what extent, are the costs for existing (PMSE) and potential (WSD) interleaved users of the 700 MHz band likely to vary depending on the timing of release? What would be the factors which affect these costs?:

See my comments above.

#### Question 11: Should we consider any other cost-related arguments / evidence in favour of an earlier or later release date?:

I think you should be looking at a very much later release date. If the mobile operators create a demand then they must pay a fixed figure high enough to satisfy your requirements, don't give it away in an auction it sterilises its use for everybody else

### Question 12: What would be the impact on mobile broadband delivery and competition of releasing the 700 MHz band later rather than sooner? :

Why don't you do your own survey and analysis on the use of mobile broadband instead of the smoke screen the operators give you?

Question 13: Should we consider any other benefit-related arguments / evidence in favour of an earlier or later release date?:

Question 14: Is the range of potential dates for release likely to be wide enough to merit consideration of an incentive auction approach?:

Don't do another auction you will loose money!

Question 15: If so, what are the challenges to designing an effective incentive auction in this case, and how might these challenges be addressed? :

Question 16: If we followed an incentive auction approach, how should we take account of wider costs and benefits ? i.e. those not felt by participants in the auction?:

Question 17: Do you have any views at this stage as to the parameters of an incentive auction, such as the default date and payment mechanism?:

Question 18: Is there a version of the overlay auction approach which could be suitable for 700 MHz release?:

Question 19: What are the benefits and risks of conducting an overlay auction in this case?:

Question 20: Have we correctly identified and characterised the potential impact of 700 MHz release on consumers accessing DTT? What other impact ? if any ? should be taken into account in order to identify pre-emptive measures to reduce this impact?:

Question 21: Do you have any comments on the pre-emptive measures relevant to DTT identified above? Are there other pre-emptive measures we should be considering?:

**Question 22: Have we identified the correct measures to support consumer adoption of DVB-T2?:** 

Question 23: What regard, if any, should we have to wider technical evolution of the DTT platform, such as HEVC? :

Question 24: Have we correctly identified and characterised the potential impact of 700 MHz release on PMSE users? What other impact ? if any ? should be taken into account in order to identify pre-emptive measures to mitigate this impact?:

### Question 25: Do you have any comments on the pre-emptive measures identified above? Are there other pre-emptive measures we should be considering?:

#### Question 26: Do you have suggestions for how we can assess the impact on PMSE users and equipment if 700 MHz is no longer available for PMSE use?:

See my comments in question in question 4. While I agree we should take the lead in Europe for frequency use, few countries abide by the rules, so although you are making them the rest of Europe doesn't comply so making PMSE use in Europe very difficult. JFMG is one of the best and they should run the whole of Europe!