Channel 4 Response to the Ofcom TV White Spaces Consultation

Channel 4 welcomes the opportunity to respond to Ofcom's document: "TV white spaces: A consultation on white space device requirements.

Channel 4 is a publicly-owned, commercially-funded public service broadcaster with a statutory remit to be innovative, experimental and distinctive. Unlike the other commercially-funded public service broadcasters, Channel 4 is not shareholder-owned: commercial revenues are the means by which Channel 4 fulfils its public service remit. In addition, Channel 4's not-for-profit status ensures that the maximum amount of its revenues are reinvested in the delivery of its public service remit, including high levels of investment in content commissioned from around the UK and across a range of genres.

Channel 4, like all the public service broadcasters, is heavily dependent on the Digital Terrestrial Television (DTT) platform to deliver its remit and meet its public service obligations. To cater for evolving audience demands and achieve digital switchover, Channel 4 and other broadcasters have invested heavily in DTT distribution over many years with major investments in the DTT platform, its distribution capacity, and new channels and services.

In this context, our concerns in relation to the White Space Device (WSD) consultation are primarily around the potential impacts of interference to the licenced broadcast services using DTT spectrum. We also note that there is still uncertainty from the testing carried out to date about the effects of co-existence, and will need to understand these effects – which we understand are planned to be subject to later consultation – before we can confirm our position.

Question 1:   Do you agree with our approach to defining the various categories of WSDs?

We agree with the approach to defining the different categories of WSDs, however in Channel 4's view the definitions of Type A and Type B could be made clearer to avoid any ambiguity.

As Ofcom has not proposed mandating using vertical geo-location, we would like to understand how the operational parameters have been calculated in relation to the more conservative approach for Type A devices.

Question 2:   Do you agree with our proposed sequence of operations for WSDs?

The proposed approach seems to be pragmatic for the sequence of operations.

We do, however, have concerns over potential fraudulent devices, and would like to understand what security measures can be put in place, for example to prevent a device using or replicating an existing unique device identifier.

Question 3:   Do you agree with our proposed additional operational requirements for master WSDs?

In general terms we agree with the proposed additional operational requirements for master WSDs. However, Channel 4 is concerned about the proposed use of non-contiguous multi-UHF channels, which will require further testing to determine the appropriate protection ratios.

Question 4:   Do you agree with the proposed additional operational requirements for slave WSD?

We are supportive of the proposed additional requirements for slave WSDs. However, we would like to ensure that a mechanism exists to prevent the manual modification by an operator / user of a slave WSD transmission parameters, including power, channel and RF performance.

Question 5:   Do you agree with the proposed device parameters, operational parameters and channel usage parameters?

We agree with the proposed device parameters, operational parameters and channel usage parameters.

Question 6:   Do you agree with our approach of implementing the requirements in the example SI and the draft IR and VNS?

The proposed approach to implementing the requirements seems sensible.

Channel 4
14 January 2013