Organisation (if applicable):

Confederation of Aerial Industries Ltd

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Question 1: Do you agree that meeting the future growth in demand for mobile broadband capacity will deliver significant benefits to citizens and consumers?:

No
The assumption has been made that the only way forward is with mobile networks. There are many other options that should also be considered including satellite and wireless systems using frequencies around 5 - 6 GHz.

Question 2: Do you agree that additional harmonised mobile broadband spectrum will play an important role in meeting the future growth in demand for mobile broadband capacity? What are your views on the overall quantity of harmonised spectrum that will be required to meet future demand? How does this compare with the expected increase in spectrum for mobile use discussed in this section?:

No
Consider the spectrum already allocated in the 800 MHz band, not the 30 MHz bandwidth allocated to downlink but in fact 792 - 862 MHz with a bandwidth of 72 MHz plus the TV channels below that will be unusable due to interference and how much above? It could be more than 100 MHz of bandwidth.

Question 3: Do you agree that additional harmonised spectrum provided by the 700 MHz band could play an important role in meeting the future growth in mobile broadband capacity? :

No
The use of more of the 'TV spectrum' will further encroach on the publics viewing capability.

Question 4: Do you agree that the value of the role played by the 700 MHz band in meeting the future growth in mobile broadband capacity would be greater if it becomes available before other capacity enhancing techniques have been exhausted at existing mobile sites?:

No
We are not convinced that this is necessary, other technologies are available that can offer internet access without it having to be mobile.

Question 5: What timing of 700MHz release would maximise the benefits associated with its use for mobile broadband?:

As Q 4.

Question 6: Do you agree that DTT will continue to play an important role in providing universal low cost access to PSB content over at least the next decade?:

Yes
The DTT signal must be protected (and not just PSB content) as much of the public has spent a great deal of money in upgrading their aerials and equipment. If FULL compensation is not offered, where problems arise, to cover EVERY TV in the household then it will be the aerial installer who will get the blame.

Question 7: Do you agree that, absent major changes in available spectrum, DTT would continue to remain attractive to viewers and deliver important benefits to citizens and consumers over at least the next decade?:

We do not fully understand the wording of this question.
DTT will be the main transmission system for the majority of TV viewers. Even when alternative methods of reception are available within the home (satellite, CATV etc) most second sets are receiving DTT.

Question 8: What are your views on the future technical evolution of the DTT platform? Are there other relevant factors affecting future DTT spectrum requirements that we should consider as we develop an approach to secure benefits from UHF band IV and V over the long term?:

HD terrestrial services (T2) were developed to give a more robust and higher quality reception so that consumers get more benefit from the DTT platform. In order to offer these services spectrum is required, those advances in technology should not be used to diminish the quality of the services in order to increase the amount of spectrum available to mobile services.

Question 9: Do you agree that a longer term approach to secure benefits from UHF band IV and V should consider how to safeguard benefits delivered by the DTT platform?:

Yes
This should be the prime consideration of OFCOM

Question 10: Are there other material factors affecting the future requirements of PMSE that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

No comment

Question 11: Are there other material factors affecting the future requirements of Local TV that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

To what part of the spectrum will local TV services be allocated? If the spectrum is shrunk even further by the loss of 700 MHz (and the associated interference from the services allocated to that frequency band) it will be difficult to see where local TV can fit alongside the existing DTT.

Question 12: Are there other material factors affecting the future requirements of WSD applications that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

WSD could well create a great problem for the aerial industry as many existing systems have locally modulated services, such as CCTV, in-house video, door entry, radio services etc etc. There is no database of communal aerial systems in flats, schools, hotels, hospitals and so on, let alone what channels these locally modulated services may be using. So we can't see how it would be possible to prevent WSD from creating interference on these systems

Question 13: Aside from WSDs, are there other innovative ways in which to use UHF bands IV and V to deliver services and, therefore, material benefits to users:

What about delivery of TV!!!
It is not necessary to use band IV & V for further mobile broadband services. There are other alternatives for this as has already been mentioned.

Question 14: Are there other material factors affecting the future requirements of emergency services applications that we should be aware of as we develop an approach to secure long term benefits from UHF band IV and V?:

No comment

Question 15: Do you agree that the approach that is most likely to secure significant benefits from UHF band IV and V over the long term is one that enables the release of the 700 MHz band for mobile broadband whilst also ensuring the role of the DTT platform is safeguarded?:

No
The release of 700 MHz band will reduce the amount of DTT coverage available. It is our belief that with the 800 MHz band channels above 56 will be affected so transmitters such as Oxford are going to be severely restricted. Extrapolating this down to 700 MHz will create similar problems and reduce the spectrum available even further.

Question 16: Do you believe there is a material risk that the DTT platform will have insufficient spectrum to continue to deliver important benefits (including providing universal low cost access to PSB content) if is the 600MHz band is not used for DTT after change of use of the 700 MHz band? :

Yes
For the reason given in Q 15

Question 17: Do you believe that using the 600 MHz band for DTT after clearing the 700 MHz band would reduce the risk that DTT platform will not be able to continue to provide important citizen and consumer benefits? :

No
We believe that the use of 700 MHz band for mobile broadband will reduce the amount of the 600 MHz band available for DTT due to the interference issues.

Question 18: Do you agree that the future benefits for citizens and consumers of enabling the release of the 700 MHz band whilst maintaining the role of DTT are likely to outweigh the loss in benefits of the 600 MHz band not being able to be used for other services in the long term?:

No
The selling off of 700 MHz band for mobile broadband will mean that the services which are presently broadcast within that bandwidth will have to be moved elsewhere thus reducing the number of channels available for future services.

Question 19: Have we identified correctly the possible short-term uses of the 600 MHz spectrum? Are there other short-term uses we should consider?:

What is classed as short term? There is much talk of what other services may be allocated to different parts of the spectrum. Should WSD devices, for example, be allocated in the 600 MHz band and then that band is reallocated for DTT who pays for the loss of the relatively new service? Would the cost of developing and marketing devices that have a short licence period be commercially worth it?

Question 20: Which option(s) for releasing 600 MHz in the short term would maximise its value whilst supporting our proposed longer term objectives?:

Not to use 700 MHz for mobile broadband

Question 21: Do you agree that the wider impacts of a future clearance of the 700MHz band could be managed to prevent them having a detrimental impact on consumers and the services operating in this band?:

No
We have already seen the problems on DTT C21 caused by interference due to simulated LTE transmissions on C60. We do not believe that the release of more spectrum will alleviate this situation.

Question 22: Do you agree that the approach set out in this consultation is likely to secure significant benefits for citizens and consumers over the long term?:

No
The document is biased toward the sell off of spectrum for mobile broadband. This will involve great expense for the TV and aerial industries which will ultimately mean the consumer.

Question 23: Have we correctly identified the main areas of future work that could follow this consultation process subject to its outcome? :

Not gone far enough
Perhaps the consumer should be informed of the pitfalls of the sell off of spectrum and not just the benefits as seen in the eyes of the mobile operator.

Additional comments: