

**Title:**

Mr

**Forename:**

Brian

**Surname:**

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**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**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

**Ofcom should only publish this response after the consultation has ended:**

Yes

## **1: Demand and supply of services:**

Whilst the changes in spectrum use prompted by the digital dividend are providing an opportunity to create new services which in turn will be an incentive to employ new and innovative designs, existing services and users must be protected, especially the various forms of television delivery. Little or no thought has been given by CEPT to the millions of viewers using a number of different platform for their entertainment services

## **2: Technological developments:**

A number of development's are of great interest including cognitive radio and white space devices (WSD), but so far they appear to be a solution looking for a problem. Again the existing platforms need protecting for example with WSD the proposed look up data base totally omits the protection of radio microphone(when used outside a fixed site) and the various communal and cable platforms enjoyed by millions of viewers

### **3: International developments:**

OFCOM has played a major role in international development's, BUT has failed to promote a balanced view of the impact of these new services on existing users of that spectrum. In future OFCOM should fully consider the full impact both the advantages (which of course are always very large) with the disadvantages ie the full cost to citizen's

### **4: Benefits to citizens and consumers:**

Again the benefits are always carefully prepared but the downside of the "interference" and costs to existing users is either ignored or minimised.

Another area which needs consideration is the manner which consultations are presented to the public, for example there are some four consultations on the use of the 790-862 MHz band each dealing with a narrow area, and Ofcom has actively prevented the full picture being presented

### **5: Future timescales:**

The recent introduction of LTE into the 790-862 MHz has been hastily introduced which will cause problems to viewers of the various entertainment platforms.

New standards for equipment which may be need to increase immunity take an absolute minim of 18 months to introduce the average is nearer 2-3 years after that equipment manufacturers will need some 18 months to bring new equipment to market

These time scales need to be considered when introducing new services, along with a full impact study at the start of any new proposals so that both process can run in parallel

### **6: Additional comments:**

Please consider all sides of the issue in future changes to obtain maximum benefit for all parties