

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

Dorset Broadcast Action Group (DORBAG)

**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:**

You may publish my response on receipt

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

See section 6

**2: Technological developments:**

See section 6

**3: International developments:**

See section 6

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



See section 6

## **5: Future timescales:**

See section 6

## **6: Additional comments:**

The proposal that the parts of the UHF television spectrum which will remain unused on the completion of digital switchover be reallocated to mobile telephony are misconceived and unfounded, for the simple reason that the digital terrestrial television service (DTTS) will require additional spectrum to make good the shortfalls in its provision to a large proportion of the population, and to accommodate the enhancements to the service which are variously promised, predicted, or encouraged.

That the DTTS was not going to be a universal service for the whole of the population was concealed from the general public until shortly before switchover began. It was only then that it was announced that relay transmitters which served 27% of the population as a whole - but a higher proportion in some areas, for example 50% in the South West region - would only carry half the programmes available to the rest of the population. In November 2009 this insult was compounded by the imposition of high definition transmissions on the one of the three multiplexes transmitted from relays, with the loss of many popular programmes. This situation was variously 'excused' by stating that it was what Parliament intended (a view not held by many parliamentarians), there was insufficient spectrum to do anything else, and latterly by saying that people who had already prepared to embrace the DTTS by investing in the appropriate equipment, should now abandon that equipment and spend considerably more to receive satellite transmissions. The insistence that there was insufficient spectrum was subsequently withdrawn.

Much was made of improvements to coverage of the nation which would be achieved with the introduction of digital technology: it would rise from 95% to 98.5%. Experience of the transition so far has shown that the number not able to receive a satisfactory digital signal is greater than the predicted 1.5%. This is authoritatively attributed to a number of factors, many of which will rely on additional spectrum to be resolved.

Members of the government, the regulator, and broadcasters (either established or putative) have spoken enthusiastically about the provision of more high-definition terrestrial transmissions, the provision of local television programmes, and even 3D transmissions. None has said how these new services are to be accommodated, unless they are to displace current services, which would be an extraordinary route to follow.

Therefore, there is an undeniable need for additional spectrum to resolve the mismatch between the service provided from relays with that provided from a main transmitters, to overcome the technical problems of reception, and to accommodate new services. Consequently the reallocation of spectrum currently allocated to terrestrial television transmission now is at best premature if not foolhardy.