

Digital dividend: clearing the 800 MHz band

Who we are

1. The Churches' Legislation Advisory Service, formerly the Churches Main Committee, is an ecumenical body that brings together all the major churches in the United Kingdom (and, because the umbrella ecumenical bodies are members, many of the smaller churches as well), together with the United Synagogue. Our purpose is to represent the major churches in the United Kingdom on issues of secular law as they affect their interests. Overall, we represent some 35,000 congregations: a note of our membership is annexed.
2. Many of our member churches used radio microphones during services in order to allow movement around large spaces during worship and we therefore welcome the opportunity to submit evidence to Ofcom's consultation.

The problem

3. Ofcom has brought forward detailed proposals for moving DTT (digital terrestrial television) from channels 61 and 62 and PMSE (programme-making and special events) from channel 69.
4. The PMSE proposals as currently envisaged will impact on users of radio-microphones on channel 69: for example, in churches where the person officiating uses a radio microphone in the pulpit or at the altar, or where a lesson is customarily read from the body of the church rather than from a reading-desk.
5. The consultation document says this:

To release the whole 800 MHz band, we need to clear channels 61, 62 and 69 of DTT and PMSE. But we need to do this in a way that does not adversely affect the important services that would have been provided using this spectrum. This means finding other spectrum that is a suitable replacement for channels 61, 62 and 69. It also means making sure we plan the change from using one set of frequencies to another very carefully so that we avoid any significant adverse effect on the users of DTT (including viewers) and PMSE [para 1.11].

6. We understand the need for change and we are reassured by Ofcom's commitment to avoid any adverse effects on existing users of 61, 62 and 69. However, at the stakeholder meeting on 25 February one matter emerged about which we are particularly concerned: Ofcom proposed a cutoff for compensation at February 2009 (the date of the consultation publication), but said that this would be reviewed in the light of responses to the consultation.
7. This seems to us to be entirely unreasonable: if a congregation bought new equipment in February, how would they *necessarily* have known that there was a consultation going on? We hope that Ofcom will reconsider this point.

8. We should also like assurances on the following:

- that compensation for 'equipment' will include compensation for the cost of acquiring it as well as the cost of the equipment itself – this is particularly important in places where radio microphones are not bought and installed by the users (unlike PMSE); and
- that Channel 61–62 radiomic users will be treated on the same basis as Channel 69 regards compensation.

9. Finally, we would suggest that whoever is managing the movement of licensees out of Channel 69 should ask each licensee whether s/he truly needs 'nomadic' (ie UK-wide) coverage. For many congregations the equipment is bought for use within the building and possibly within its immediate surroundings (such as the church-yard or the church hall) but not otherwise: and we suspect that, for many of them, if asked the question the answer would be 'no'.

Conclusion

10. To sum up, what the churches are looking for is:

- full compensation for the expense incurred as a result of the proposed changes;
- a migration to the new spectrum that will not interrupt the present service; and
- access to reliable and economical spectrum under the new arrangements.

Frank Cranmer

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Annex: Members and Associate Members of CLAS

Apostolic Church
Association of English Cathedrals
Association of Grace Baptist Churches (SE)
Baptist Union of Great Britain
Baptist Union of Wales/Undeb Bedyddwyr Cymru
Church Communities UK
Church in Wales/yr Eglwys yng Nghymru
Church of Christ Scientist
Church of England
Church of Ireland
Church of Scotland
Churches Together in Britain and Ireland
Churches Together in England
Congregational Federation
CYTŪN
Elim Foursquare Gospel Alliance
Evangelical Alliance
Fellowship of Independent Evangelical Churches
Free Church of Scotland
Free Churches Group
General Assembly of Unitarian and Free Christian Churches
Independent Methodist Churches
Irish Council of Churches
London City Mission
Lutheran Council of Great Britain
Methodist Church
Moravian Church
Presbyterian Church in Ireland
Presbyterian Church of Wales/Eglwys Bresbyteraidd Cymru
Religious Society of Friends (Quakers)
Roman Catholic Church in England and Wales
Roman Catholic Church in Scotland
Salvation Army
Scottish Episcopal Church
Seventh-Day Adventist Church
Union of Welsh Independents/Undeb yr Annibynwyr Cymraeg
United Free Church of Scotland
United Reformed Church
United Synagogue
Wesleyan Reform Union