

Additional comments:

Question 1: Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?:

Whilst I appreciate that the clearance of this spectrum would benefit users of new mobile phone applications, I cannot agree that it benefits most citizens and consumers unless some of the profit made from selling it is used to properly compensate those affected financially by the changes.

Question 2: Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.:

Yes I agree with the criteria but would like further clarification as to whether any funding would be available for current owners of wireless radio microphones/in-ear monitors which operate in those channels.

Question 3: Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?:

Yes, I agree that the hybrid option is the best idea as it will, as I understand it, keep channels 39 and 40 more available than the other two options.

Given the proposal to move PMSE to channel 38, I would favour any option which would keep channels 39 and 40 readily available UK-wide for PMSE use. That is, if channel 39 is in use for DTV, then it would be extremely useful if channel 40 isn't. This would give a much greater versatility of frequency options for large-scale entertainment productions. It is important to have plenty of spectrum available close to channel 38 in order to utilise the frequency ranges which will be available to us after DSO.

Question 4: Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most consistent with the DTT migration criteria? If not, why not?:

Question 5: Do you agree that a programme-control and -governance arrangement such as that outlined above is appropriate?:

Question 6: Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and

62? Are there any costs that do not appear to have been accounted for in any of these categories?:

Question 7: Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?:

Question 8: Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?:

Yes

Question 9: Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?:

Yes

Question 10: Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?:

Yes

Question 11: Do you agree that channel 38 is the best alternative to channel 69 for PMSE?:

I agree that potentially it is, but until we know the outcome of the sale of channel 37 and any likely interference caused by transmissions, we cannot be sure that it will be a like-for-like replacement.

If channel 37 were to be taken out of the auction process in order to properly protect channel 38 it could be treated as interleaved spectrum and licensed where available whilst also ensuring absolute coverage of channel 38 UK-wide.

Question 12: Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?:

Yes, absolutely.

I am particularly concerned about one suggestion which was made that channel 38 users would have to submit frequencies on a daily basis (similar to current interleaved spectrum licensees). This would be absolutely unacceptable as it would become a full-time job for someone in a company our size.

Question 13: Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months' notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?:

Yes, I think this is absolutely necessary to minimise disruption that this spectrum is available until AT LEAST 2012.

Question 14: Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?:

You only mention radio microphones in your document but there are many other pieces of equipment which will be affected by the disappearance of channel 69. Wireless in-ear monitors are a massive business - for example we, as a company, have 40 systems which operate in channel 69 and another 20 spare beltpack receivers.

It is also worth considering that it is not just transmitters and receivers which will be affected. There are antennae, antenna combining units, antenna splitter units and antenna boosters, many of which are frequency specific and would also need either modifying or replacing. It would be totally wrong not to include these in any funding.

As a company we would require at least £300,000 to replace all our channel 69 gear with new. Using your calculation we would only be awarded £150k, leaving us the same amount to find ourselves. We cannot possibly afford this and, meanwhile, we would be unable to fulfill our customers orders which would result in further losses to the company. Whilst some equipment would eventually need replacing we would not expect to do this in any great quantity over the course of the next 3-years - it would be spread out and would also involve the selling of old equipment in order to finance the purchases - something we would be unable to do in this case.

I am also concerned as to how we would be expected to prove the age of each piece of equipment.

I believe your lower estimate of £5m to be totally unrealistic as it would only require 33 channel 69 users of our size, getting 50% replacement funding, to use up that £5m! £18m may be nearer the mark but perhaps that would be a more appropriate lower limit.

Whilst it would be great if we could get all current channel 69 wireless equipment modified (much cheaper than buying new), are the manufacturers going to be in a position to do this for thousands of customers? Will they get funding to set up workshops to carry out the work? If not, can they be expected to give priority to modifying equipment rather than trying to sell new? I can imagine a huge pile of wireless gear sitting waiting to be modified, meanwhile, channel 38 users are forced to buy new equipment in order to bridge the gap whilst waiting for modified gear to be returned!

Given that the revenue from sale of this spectrum will be in the region of £2-3bn, surely you could replace every piece of channel 69 equipment with new (if modification is not a viable option) and still hardly make a dent in the profit.

Question 15: Do you agree that three years is long enough for PMSE to move from channel 69?:

Yes, providing that there is equipment available to buy and the structure within the manufacturing companies to modify equipment. And also that sufficient funding is available to enable users to make the transition without incurring massive costs and for manufacturers to provide modification services.

Question 16: Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?: