

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?:

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.:

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?:

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?:

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

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

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

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?:

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?:

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?:

We do not believe that a proper crossover period has been proposed. Manufacturers must be given adequate notice to allow channel 38 equipment to enter the market. Assistance for 'trading in' old equipment must continue until channel 38 equipment is freely available to purchase and use under the same licencing conditions as channel 69 equipment.

Many organisations will consider their equipment to have a lifespan of more than 10 years. Well maintained radio mic systems may last a lot longer. Some will have invested in older 'top end' equipment rather than brand new lower spec equipment and they will be unfairly penalised. For these organisations a proportion of their stock may now be classed as worthless, or near worthless. These organisations are likely to be churches, regional theatres, amateur dramatics, live music venues, schools etc.

The proposed compensation based on the residual value of current equipment is unreasonable. Leaving the actual valuation aside for one moment, brand new equipment will have to be purchased. The difference between the cost of buying new equipment and the valuation of the old equipment will have to be made up by the individuals concerned. Instead of being able to phase in new equipment over a period of time suited to the organisation, new equipment will have to be phased in over a fairly short period of time, when demand will be high for new equipment, and therefore discounts and deals deficient. Manufacturers will be quick to bring out new models and variations and adjust prices accordingly. For the majority of people a 'like for like' replacement is not going to be an option available to them, and replacement equipment will cost significantly more than the current model did when purchased new. When considering the number of channels that even a small organisation or company may own the proposal becomes unfair and financially unworkable. The report's own forecast is that it only estimates needing to find funds for 50 per cent of the value in old equipment. When taking into account the inflated cost of new equipment the actual cost to companies, individuals and other organisations will not be as straight forward as finding the other 50 percent, which would be a financial nightmare on its own. In our opinion compensation must come in the form of replacing old equipment for new. At the very least a longer crossover period should be given to allow as much 'natural wastage' as possible.

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

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?: