

**RESPONSE FROM DMOL TO OFCOM'S
CONSULTATION ON DIGITAL DIVIDEND REVIEW:
geographic interleaved awards 470-550MHz AND 630-790MHz**

Introduction

DTT Multiplex Operators Limited (DMOL) is a company owned by the operators of the six DTT multiplexes (BBC, Digital 3and4, SDN, NGW). DMOL's main purpose is to provide technical management and co-ordination of the DTT platform.

DMOL's functions and activities include:

- Specification and ownership of Central Service Information (CSI) equipment
- Management of a contract for the provision of CSI
- Agreements with multiplex operators for the provision of CSI
- Ensuring DVB compliance of the DTT platform
- Management and communication to the industry of changes to the DTT platform
- Allocation of Logical Channel Numbers (LCNs) for DTT services and collection of charges
- Development, publication and management of the DTT LCN Policy including periodic consumer research.
- Representation of members' interests on the Digital Television Group
- Working with Digital UK on DSO matters
- A number of specialist subgroups to manage the above
- Liaison with Freeview

DMOL therefore has a strong interest in the outcome of the DDR auctions in order to ensure:

- As far as possible the smooth integration to the platform of any new DTT services
- The accommodation, as appropriate, of new non-DTT services and monitoring of any impact on DTT services.

DMOL does not have a view on many of the issues identified in the consultation such as the design of the auction process and this response is confined to matters of interoperability and platform management.

Uses of the geographic interleaved spectrum

DMOL notes Ofcom's view that the most likely uses for the interleaved spectrum are DTT services, PMSE services and cognitive devices and that the implications for the last two uses will be the subject of separate consultations.

In this response, therefore, we concentrate on the implications in respect of the new DTT services (which may be associated with cleared spectrum usage) and especially the complications that might arise as a result of the launch of a multiplicity of local television services.

It is clear that there are a number of interoperability issues that need to be managed if new services are to be smoothly integrated on to the DTT platform. DMOL is keen that this should happen in the least disruptive way for viewers as a result of which a dialogue has been taking place with Ofcom to ensure that there is a mutual understanding of the complexities and options.

The possible volume of separate licences and separate services that may be introduced in the interleaved spectrum presents real challenges of co-ordination. DMOL will assist with providing a framework for integration but is not resourced to handle a significant number of parallel integration discussions. We believe therefore that Ofcom should encourage applicants wanting to operate Local Television services to organise themselves into a collective body which could be the interface with DMOL. This has the possible advantages of :

- Economies of scale
- Ensuring equality of treatment across all local licensees
- Reduced administration

DMOL will continue its discussions with Ofcom in order to agree the framework within which such an approach might operate.

TECHNICAL LICENCE CONDITIONS

DMOL notes the proposed Technical Licence Conditions which are designed to provide necessary levels of protection to existing services and between new services and has no comments to make on these.

NON-TECHNICAL LICENCE CONDITIONS

As already stated, DMOL's primary concern in relation to this consultation is to ensure that the appropriate framework is in place to ensure the smooth integration on to the DTT platform of new operators. We are keen, therefore, to assist Ofcom in (a) agreeing that framework and (b) ensuring that new operators have a clear advance understanding of the likely integration requirements.

To that end, and in response to Q.20 DMOL does not agree with Ofcom's proposed option for dealing with interoperability issues. Instead we believe that integration and interoperability of new services is so critical to the viewer experience that it needs to be underpinned by mandatory licence requirements similar to those in existing DTT multiplex licences. Unless there is symmetry between the obligations of all the participants it will be extremely difficult, if not impossible, for DMOL to play an effective role in creating the necessary cross platform consensus.

We note in 9.27 that Ofcom refers to the role of DTG which we agree it is important that new operators should recognise and Ofcom should encourage them to join if not already in membership.

However, the consultation does not reflect the equally critical position of DMOL in respect of technical management of the DTT platform and in providing a forum for all multiplex licensees. This has been crucial in facilitating consensus and until last year when DMOL was incorporated was managed successfully on an informal basis.

One of the drivers for last year's incorporation was the anticipation that the platform would expand and that the relationship between multiplex licensees needed to be put on a more formal footing. Having established that foundation it would not be helpful if new

licensees did not have an obligation to co-operate with the existing licensees - preferably as members of DMOL.

As already stated, one of DMOL's principal concerns is that all the relevant interoperability issues are properly addressed. We believe that the consultation deals well with the RF issues but falls short in respect of other matters such as SI which are under DMOL's management.

Clearly it is desirable, from both a consumer and service provider perspective to have receivers which interoperate with existing and new services. It is important to have properly managed and compliant CSI to facilitate this interoperability and, as importantly, to prevent emission of CSI or other applications by new operators which could interfere with other existing or new transmissions.

From discussions that have already take place between DMOL and Ofcom there is no doubt that Ofcom understands the need for establishing arrangements for interoperability in this area but we are concerned that the "facilitating" option that Ofcom has said it prefers will not necessarily create the appropriate level of imperative within new operators to make it happen effectively.

DMOL believes there is a compelling case to mandate a requirement for interoperability since :

- It is the only way to guarantee interoperability and compliance across the whole range of services
- It stands the best chance of protecting viewers from disruption to services and confusion
- At a time when the platform is undergoing a seismic shift due to DSO and the introduction of T2 and MPEG 4 it is the most efficient way to achieve the desired end result.

DMOL will assist in integrating new operators to the DTT platform and is keen to have a continuing dialogue with Ofcom about how best this can be achieved but we believe that there needs to be a strong licence incentive for new operators to co-operate in the process. Otherwise there is a danger to both existing services and reception and the launch of the new services. Clearly it is DMOL's expectation that new entrants will bear their own costs of achieving this inter-interoperability.