



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

12th August 2008

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Introduction

Digital UK is the body established by broadcasters at the behest of Government to lead digital television switchover (DSO) in the UK.

DUK does not have a view on many of the issues identified in the consultation such as the design of the auction processes and this response is confined to matters which may impact on the DSO process. In particular, we are concerned that Ofcom should continue to ensure that the implementation of the DDR does not adversely impact upon

- Viewers' ability to receive DTT services after DSO
- The DSO timetable

Potential optimisation of interleaved spectrum

Paragraphs 5.16 to 5.22 refer to the possibility that the coverage achievable from the interleaved spectrum in Scotland and Northern Ireland could be improved by making changes to the DSO frequency plan for the existing DTT multiplexes.

Digital UK has already expressed serious concerns about this proposal in respect of the DSO frequency plan for Scotland. The DSO implementation planning timetable requires the conclusion of the RBL analysis for Scotland by August 12th 2008. After that date, any revision to the frequency lockdown for the Scottish regions will require the RBL analysis to be re-assessed. This is by no means a trivial exercise and would result in delay to the Scottish design lockdown, impact on the Regional System Design Process for other regions, which, in turn, could lead to delays in the overall DSO programme.

The proposal also would impact adversely on the coverage of at least one DTT Multiplex from Rumster Forest thereby exacerbating the 3mux/6mux issue and requiring changes to the advice currently given to viewers via the DUK Predictive Coverage Database.

We welcome, therefore, the assurances given by Ofcom that there is no intention to amend the Frequency Plan for Scotland in advance of DSO and that any subsequent change would need to be negotiated with existing DTT multiplexes by any new licensee which would also be responsible for all incremental infrastructure costs. Digital UK is proceeding with DSO planning and implementation on that basis.

The circumstances in Northern Ireland are different in so far as the planning and implementation is not as far advanced as for Scotland because of its relative position in the overall DSO timetable. Nevertheless, decisions are imminent about new mast designs and some antennas so there is potential for an impact upon the DSO timetable if decisions are not made soon.

Impact of new DTT services on the existing DTT multiplexes

As a general proposition, DUK is concerned that the introduction of new services under the DDR process should not adversely affect the choice of services to viewers *as currently predicted*.

The Digital UK Postcode Checker gives viewers a detailed understanding of the services available to them on DTT before, during and after DSO. Viewers are basing their decisions about choice of platform and possible aerial changes or upgrades on the information provided which includes, where applicable, choice of regional services and, importantly, the number of multiplexes receivable from different transmitters. In 2007/08, 4 million viewers used the PCD. Any decision to change the parameters for protection to existing services and/or choice of services could, therefore, have a significant impact.

For these reasons, DUK does not support the proposed "Median Option" for protecting post-DSO coverage of existing multiplexes. DUK believes that the JPP proposal should be adopted instead.

The JPP proposal stops short of protecting all overlaps but protects the following:

- DPSA (Digital Preferred Service Area): ensuring that the 'best' DTT signal is protected.
- APSA (Analogue Preferred Service Area): ensuring that account is taken of where existing domestic aerials are pointing thereby minimising the number of households required to make aerial changes.
- Correct national/regional service: ensuring that English, Welsh and Scottish households have an appropriate protected 3PSB national service and that 'correct' ITV and BBC regional services are also protected.

While the "Median" option protects DPSA and APSA it does so at a lower level by allowing higher interference and it does not protect correct nationality or regionality.

DUK believes that it is vitally important to maintain the existing predicted services. Therefore DUK's response to Ofcom's Question 7 is negative. Account must be taken of the potential disruption to viewers and the impact on those who have already exercised DSO options based on information which could change if the Median option were to be adopted.

Timing of Awards

Question 9 of the Consultation asks for views about the timing of awards for the Interleaved Spectrum and, in particular, linkage to the timetable for the Cleared Spectrum award.

DUK does not feel strongly about the linkage between the two awards but it is concerned that full account should be taken of the potential impact on DSO and the need to ensure that no decisions are taken which inhibit the necessary flexibility to plan DSO with minimum impact on viewers.

Agreement has already been reached with Ofcom about the need to use temporary Parking Channels at various stages in the DSO implementation programme to protect existing services against unacceptable levels of interference from neighbouring UK regions or from other countries. We are confident that Ofcom will ensure that the timing of the awards does not prevent access to those Parking Channels.

However, the latest assessment of interference issues including an updated prediction of incoming international interference is still underway (the B15 process). This may lead to further requirements for Parking Channels in both the Interleaved and the Cleared Spectrum as may the outcome of continuing International Co-ordination negotiations.

DUK urges that Ofcom does not commit to a timetable for the award of interleaved spectrum until it is clear that, in any particular locality, there is no requirement for its temporary use to ease DSO implementation and minimise disruption to viewers.

TECHNICAL LICENCE CONDITIONS

In relation to Q.17, Digital UK does not have any specific comments to make about the proposed technical licence conditions. However, it would like to propose that Ofcom should include a further condition to impose an obligation for new licensees to co-operate with DUK and DMOL in relation to the planning and implementation of new services to ensure that any impact on DSO and the DSO timetable is minimised.

NON TECHNICAL LICENCE CONDITIONS

Interoperability

In response to Q.20, DUK has concerns about the ability for new operators to inadvertently disrupt the performance of existing receivers during DSO. Even after 10 years experience of the transmission of the existing six DTT multiplexes there are still issues with receivers when some new (compliant) applications are launched. In order to maintain, as far as possible, the stability of the DTT platform during DSO we believe that Ofcom should include in new licences mandatory obligations regarding interoperability, co-operation with existing multiplex operators and between new operators both in respect of cleared and interleaved spectrum.

It is critical to the DSO process that new operators do not introduce any new transmissions that disrupt the operation of compliant receivers, which event could have a disastrous impact on DSO. It is essential that transmission streams, including SI, are fully compliant and subjected to rigorous testing via DMOL and DTG before being put to air and that this requirement is underpinned by licence requirements.

SUMMARY

DUK welcomes the clarity that Ofcom's Consultation begins to bring to the likely DDR award process. So long as it is carefully managed to protect existing services and the DSO timetable the process should provide a welcome indication to viewers of additional value of DSO in bringing them new services.

Our concerns expressed above are intended to ensure that those benefits are not negated by disruption to the fundamentals of DSO.