

Question 1: The executive summary sets out our proposals for the digital dividend geographic interleaved award. Do you agree with these proposals?:

Question 2: Do you have any comments on our assessment of the most likely uses of the geographic interleaved lots? Are there any potential uses which should be considered that we have not mentioned?:

Question 3: Are there any other types of DTT transmission that should be protected from potential cognitive devices or other factors that we should take into account?:

note our response to Q5

Question 4: Are there any potential future PMSE applications, other than currently available wireless microphones, in-ear monitors and talkback systems, that you consider should be protected from potential cognitive devices?:

Question 5: Is there sufficient evidence to require protection for other services such as mobile television, bearing in mind the potentially negative implications of such protection for deployment of cognitive devices?:

On the question of whether to protect mobile TV from cognitive radio devices we agree that co-existence is challenging. However it seems as unreasonable to rule out the possibilities of mobile TV from using interleaved spectrum (by not requiring protection from cognitive devices) as it does to risk that the spectrum lies unused. There is an opportunity cost in not requiring protection of mobile TV that should be taken in to account.

There is, in any event, an 'essential requirement' under the RTTE Directive that requires that radio devices avoid causing harmful interference. Licence-exempt devices usually satisfy this requirement by only sharing spectrum with other devices where operation will not be unduly harmed (eg other similar devices, Wifi etc) or other unlicensed services for which it is accepted that they cannot usually claim protection (cheap walkie-talkies etc). Broadcast services, including mobile TV, do not fall in either category.

Therefore we believe that cognitive devices should only be allowed on a non-interference basis. It could make the difference between mobile TV in UK being a success or not.

Question 6: What levels of coverage and aggregation are of interest to you?:

Question 7: Do you agree that the median option offers an acceptable balance between protecting reception of DTT services and maximising new DTT services using geographic interleaved lots?:

Question 8: Do you agree with the proposal for a series of awards of spectrum lots - an award of lots for Caldbeck, Winter Hill and Wenvoe in late 2008 or early 2009, a single award in 2009 of large lots and awards of lots for other locations linked to DSO?:

Question 9: Do you agree with the proposal to hold the combined award for large lots of geographic interleaved spectrum shortly after the cleared award in 2009? What should the time interval be?:

Question 10: Do you agree with our approach to expressions of interest in order to finalise the spectrum lots appropriate to allocate by auction?:

Question 11: Do you agree that we should run single unit ascending bid auctions for the award of each of the spectrum lots for Caldbeck, Winter Hill and Wenvoe?:

Question 12: Do you have comments on whether the initial auctions of spectrum lots for Caldbeck, Winter Hill and Wenvoe should be run in sequence or in parallel?:

Question 13: If the initial auctions are run in sequence do you have a preference for the order in which they run?:

Question 14: Do you consider that a combinatorial clock auction would be more suitable than a simultaneous multiple round auction for the combined award of large lots suitable for aggregation?:

Question 15: Do you agree with the proposal that the phased award of medium/small spectrum lots at locations linked to the DSO timetable should be by single unit ascending bid auctions? If not, which would be your preferred auction format and timing?:

Question 16: Do you agree with the proposals for the main rules that we are minded to adopt for each of the three single unit ascending bid auctions?:

Question 17: Do you have any comments on the technical licence conditions we are proposing to include in the licences?:

Question 18: Do you agree that the licences for the geographic interleaved spectrum should not allow the co-ordination threshold to be exceeded?:

Question 19: Do you agree that where the geographic interleaved spectrum is used for the operation of a DTT multiplex, we should replicate the ownership restrictions from the Broadcasting Act regime relating to (a) local authorities, (b) political bodies, (c) religious bodies and (d) bodies exerting undue influence but not replicate restrictions relating to (e) broadcasting bodies and (f) advertising agencies?:

Question 20: Do you agree that we should facilitate interoperability between existing DTT multiplex operators and new operators using cleared spectrum?:

Question 21: We welcome views on the merits of the proposed approach to information provision:

Question 22: Do you agree with our approach to assessing whether the awards of geographic interleaved spectrum fully promote competition and efficiency?:

Question 23: Do you have particular concerns about possibilities for award outcomes to fail to fully promote competition in downstream markets or to result in inefficient use of spectrum? If so, please explain what these are and provide supporting evidence.:

Question 24: Do you agree with our proposals to include an information provision licence condition to help facilitate efficient secondary trading?:

Question 25: Do you agree with our view that we should not apply any general remedies other than for information provision in the geographic interleaved award?:

Question 26: Do you agree with our initial assessment that we should not intervene in the geographic interleaved award to remedy any potential impact on competition resulting from the holding of geographic interleaved spectrum by either Sky or NGW/Arqiva?:

Additional comments: