

**Title:**

Mr

**Forename:**

Richard

**Surname:**

Harvey

**Representing:**

Self

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1: Do you agree with the criteria against which we propose to assess the functioning of the pay TV sector?:**

**Question 2: Does our overview of the pay TV market fairly reflect the key developments within this market?:**

**Question 3: Do you agree with our analytic framework for the pay TV value chain? If not, why not?:**

**Question 4: Are there any additional comments or evidence which you wish to provide?:**

**Question 5: Do you agree with the views we have expressed as to the level of platform and content choice available?:**

**Question 6: Do you agree with our analysis of innovation levels in UK pay TV? Do you agree with our assessment of what has driven innovation in the past, and what will drive it in the future?:**

**Question 7: Do you agree with our analysis of pricing structures in UK pay TV? Do current pricing structures act in the aggregate interests of consumers?:**

**Question 8: Do you agree with our assessment that there is currently insufficient evidence to support a conclusion that prices in the UK are excessive?:**

**Question 9: Do you agree with our initial assessment that there is not convincing evidence to support the claim that the industry is earning excessive profits? Is there evidence to support the suggestion that Sky is pursuing objectives other than short term profitability?:**

**Question 10: Are there any other comments or evidence which you wish to provide?:**

Just two simple points:-

1. Sky uses Rateable value to assess its rates for the licensed trade to show the Premiership. Is this fair when taking into consideration many pubs have separate rooms and areas where football is not shown. Furthermore, some small pubs have high rateable values purely because of town/position not affinity to football!
2. Is it fair that to show the Premiership via sky would cost me approximately £10,000 pa when I can buy it via Digi Albania for £144 pa!

**Question 11: What is your view on our approach to defining markets?:**

**Question 12: Do you agree with our definitions of premium content markets?:**

**Question 13: Do you agree with our preliminary conclusions on basic / free-to-air markets?:**

**Question 14: Do you agree with our assessment of market power?:**

**Question 15: Have we identified the correct set of intrinsic market characteristics? Are there any that you would add?:**

**Question 16: Have we correctly captured the role of vertical integration?:**

**Question 17: Do you agree with our assessment of the effects of content aggregation on retail competition?:**

**Question 18: Do you agree with our summary of the possible issues relating to the short-run operation of the market?:**

**Question 19: Do you share our possible concerns over the long-run operation of the market?:**

**Question 20: What do you see as the impact of these considerations on consumers?:**

**Comments:**