

**Question 1: which services are most likely to drive take up of DTT consumer reception equipment using new technologies? In particular, are HD services the most likely to do so?:**

GMS believes that HD services will drive take up of DTT consumer reception equipment using new technologies.

**Question 2: do you agree with Ofcom's assessment that it would be beneficial for the DTT platform to begin to upgrade to new technologies ? DVB-T2 and MPEG-4 - to make more efficient use of spectrum and to allow for the introduction of new services?:**

The scarcity of spectrum encourages all to use the spectrum that is available as efficiently as possible. As new technologies continue to develop they should be adopted providing that they do not disadvantage existing consumers and citizens. The plans to introduce DVB-T2 and MPEG-4 to the DTT platform, whilst retaining the current channel line up for consumers who have not upgraded, should be implemented as soon as is practical. In addition, clear intentions to launch and timetables should be issued to encourage the manufacturers to bring these technologies into their product development plans.

**Question 3: Ofcom is particularly interested in hearing from multiplex operators and programme providers as to whether they are interested in using DVB-T2 and / or MPEG-4, and whether Ofcom should consider permitting their use on DTT?:**

As a programme provider and partner in the new Gaelic Digital Service (GDS) GMS considers that Ofcom should be both permitting and encouraging the use of DVB-T2 and MPEG4 on DTT. GMS also considers as the consumer market develops that the extra services which will be available only through the MPEG4 and DVB-T2 receiving equipment should be placed under a simple brand so that consumers and citizens can link the brand to the extra services they will receive.

**Question 4: do you agree that the earliest possible availability and adoption of the technologies is in the interests of consumers and citizens?:**

GMS considers that the earliest adoption and clear signalling to the entire digital television supply chain that these technologies are to be adopted is in the best interests of consumers and citizens.

The communication of the new technologies and the additional services that they offer must be carefully managed to ensure that there is minimal confusion in the market for the receiving equipment. The communication must ensure that the consumers and citizens who have already invested in DTT receiving equipment do not feel as though they have bought obsolete technology. This could stall the market for DTT as consumers and

citizens await the new technology during this critical time now that switchover has commenced.

**Question 5: do you agree with Ofcom's view that DVB-T2 MPEG-4 reception equipment could be commercially available in time for DSO in Granada region in late 2009?:**

GMS considers that this is an achievable date providing the supply chain has confidence that the technologies will be adopted and that the additional services that are available through DVB-T2 and MPEG4 will drive demand. As stated earlier, clear branding for consumers and citizens for the extra services will be important.

**Question 6: do you agree that some form of intervention is required in order for the DTT platform to commence an upgrade to new technologies without delay?:**

GMS considers that it is essential that there is sufficient intervention to ensure that both these new technologies, the changes to the multiplexes and the channel line up are implemented. Significant investment will be required by the supply chain for DTT. Any uncertainty will cause delay and potentially jeopardise the success of implementing the new technology.

**Question 7: Do you have any proposals for launching MPEG-4 services on a DTT multiplex using DVB-T in advance of the proposed 2009 timetable and if so can you provide details of how such a service would not undermine the proposed MPEG-4/DVB-T2 launch in 2009?:**

GMS has no proposals to launch such services in advance of the 2009 timetable.

**Question 8: do you agree with Ofcom's proposed approach for adding SD and HD versions of MPEG-4 and DVB-T2 profiles to the list of permitted standards for DTT in the spring, and that Ofcom's consent must be sought prior to adoption of these standards?:**

Yes.

**Question 9: do you agree with Ofcom's proposal that Multiplex B should be cleared and upgraded to new technologies?:**

GMS supports Ofcom's proposals to clear Multiplex B for the new services. GMS considers that any alternative proposals that may be put forward for the use of Multiplex B for new services should also be the subject of consultation.

**Question 10: do you agree with Ofcom's proposal that all multiplexes should be required to upgrade to 64QAM at DSO in order to make the most efficient use of spectrum (ie that the mode change should not merely be optional)?:**

GMS considers that 64QAM should be mandated by Ofcom to ensure the most efficient use of spectrum.

**Question 11: do you agree with our proposals for accommodating Five, S4C, TG4 and GDS on Multiplex 2?:**

GMS considers that services of a public service nature should be universally available to viewers on a PSB multiplex. This accords with Ofcom's view that digital switchover will allow DTT to be the way in which the whole of the UK has access to Public Service Broadcasting free-to-air. The indigenous language services of Wales, Northern Ireland and Scotland fall, or will when available fall, within this category of service.

GMS fully supports this proposal and in particular the creation of a Nations channel to provide TG4 in Northern Ireland, S4C in Wales and GDS in Scotland. The adoption of the new technologies together with the clearing of Multiplex B will provide an opportunity to bring the three current national services into one single videostream.

Placing the obligations for the three Nations on one multiplex will lead to the most efficient use of the spectrum for these regionalised services. Additionally the nature of the Nations services are such that it is important that the population of each of the Nations is able to see programming specifically targeted at that audience.

The selection of Multiplex 2 is additionally helpful as the current services on the multiplex are already regionalised to an even greater granularity than is required for the Nations channel and therefore there should be no additional regionalising costs to be borne.

**Question 12: do you agree with our assessment that nine SD services can operate on Multiplex 2? If not, do you have an alternative proposal?:**

The Ofcom review of the multiplexes considers that all multiplex operators must be required to operate their multiplexes in the most efficient manner to maximise the number of services without any impact in picture quality from the perception of consumers and citizens. GMS has noted that the multiplex operators, even accounting for the current differences in the QAM setting, deliver significantly different number of services on a multiplex. At present 10 channels of TV seem to be possible on multiplexes operating at 64 QAM. Therefore we consider that at least nine services must be possible on Multiplex 2 even allowing for the data services.

GMS welcomes Ofcom's commitment to the principle that alternative proposals from the PSBs must, if advanced, include sufficient capacity to carry the national services.

**Question 13: do you agree with our proposals for the reorganisation process for the existing multiplex services set out in the central case scenario?:**

GMS supports Ofcom's proposals for the reorganisation process. Should alternative proposals be advanced we believe they should be the subject of consultation.

**Question 14: do you agree with the principles / conditions that Ofcom proposes to use to evaluate counterproposals for the reorganisation process?:**

GMS supports Ofcom's proposals to evaluate any counter proposals.

**Question 15: Do you have an alternative proposal for the reorganisation process? If yes, please provide details.:**

GMS supports Ofcom's proposals and does not plan to submit any alternatives

**Question 16: do you agree with Ofcom's assessment of the options for allocating the upgraded capacity?:**

Yes

**Question 17: do you agree with the proposal that HD broadcasting on the DTT platform should use the more efficient progressive format, rather than the interlaced format?:**

Yes

**Question 18: do you agree with the proposal that Ofcom should not mandate the use of the capacity for any particular service type (SD or HD) but allow the broadcasters to make proposals?:**

Yes

**Question 19: do you agree with the proposal that the capacity should be allocated in three UK-wide blocks initially, rising to four blocks at DSO?:**

GMS considers it essential that capacity should be allocated in a manner which offers potential access to all present and future providers of public service content. Allocation of capacity in larger blocks, if adopted, should make provision for the provision of public

service content in HD format from all providers, including the indigenous language services of the nations.

**Question 20: do you agree with the proposed criteria for the comparative selection process?:**

GMS is concerned that the limitation of the process to PSB institutions may be unnecessarily restrictive and may compromise the range and diversity of high quality television advanced as a selection criteria. Consumers of indigenous language content in the Nations should not for example be deprived of content in HD format if it happens that the provider is not on current definition a PSB institution. In this respect we note that the PSB Review may result in important changes to the PSB system.

**Question 21: do you have any comments on Ofcom's proposals for the upgraded multiplex?:**

GMS has no comment.

**Question 22: Do you agree with Ofcom's impact assessment?:**

GMS Supports Ofcom's impact assessment

**Question 23: Do you agree with Ofcom's assessment of the potential benefits, risks and mitigations strategies relating to the impact of these proposals on the DSO programme?:**

GMS supports Ofcom's proposal for Channel Five to use ITV capacity and Channel four to carry the Nations videostream.

**Additional comments:**

GMS considers that Ofcom should review the obligations on Multiplex A to carry a Gaelic language service in Scotland if the proposals for the Nations videostream are adopted. GMS is a major supporter of the TeleG service in addition to being one of its main programme providers.