

**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?:**

HD is without question the new driver for technology. Current TV screens are already in advance of the standards currently and imminently being provided by broadcasters; it is very easy to purchase 1080P50 TVs today.

Bluray and HD-DVD are already in the high street.

The consumer has every expectation of HD services as a matter of course and not just for those able and/or willing to pay for subscriptions.

Freesat will broadcast HD during 2008; DTT MUST follow suit.

**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?:**

MPEG4 for sure; already mandated in France. TV manufacturers are already geared up to deliver compatible IDTVs including MPEG4 decode.

To date there is no clear intention of any country other than the UK to use DVB-T2 even if the DVB-T2 Technical Module is extremely active on the subject.

TV manufacturers are unanimous in their statement that they wish only to manufacture pan-european equipment and NOT include functions needed by just one country. This presents a risk to take-up of T2 equipment.

**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?:**

no comment

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

YES providing it is a PROVEN technology.

**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?:**

There is no question that MPEG4 decoders will be available in the given timeframe. Indeed there are several devices for SD and/or HD available already.

DVB-T2 however is another issue. Preliminary estimates indicate that second iteration silicon could be available during Q3/4 2009. This permits mass-production of equipment in 1H2010. No assumption is made for the "fit-for-purpose" of first iteration silicon even though it may theoretically be useable.

This timeline does not take into account any as yet unidentified technical issues which may arise subsequent to acquiring silicon and performing real field trials.

**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?:**

no comment

**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?:**

no comment

**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?:**

I agree that these profiles need to be included in the list of permitted standards at the earliest opportunity.

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

no comment

**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)?:**

YES

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

no comment

**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?:**

no comment

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

no comment

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

no comment

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

no comment

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

no comment

**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?:**

Experts agree that progressive scanning offers many benefits over interlaced and it seems unwise to remain locked to old standards when we have the opportunity to gain multiple benefits.

Display equipment is inherently progressive it makes no sense to make concatenated mode changes throughout the system when a single progressive system could be employed from day-one.

On the same basis 1080P50 decoder silicon will be readily available within 2008.

**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?:**

To the extent that what is required is new benefits stemming from new technology. What we do not need is more SD shopping channels! Some form of "mandation" or

control is needed to ensure that quality comes before quantity. A total hands-off approach carries undesirable risks.

**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?:**

no comment

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

no comment

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

no comment

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

no comment

**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?:**

no comment

**Additional comments:**

Responses provided are on the basis of the availability of silicon solutions to technical requirements rather than any deep knowledge or understanding of spectrum