

**Comments on Ofcom consultation, “The Future of Digital Terrestrial Television:
Enabling new services for viewers”.**

We welcome Ofcom’s consultation on its proposals for the further development of the DTT platform. We agree that the current opportunity to increase the available capacity by upgrading to new technologies should be seized. We consider that the proposals will achieve an efficient use of radio frequency spectrum and make available greater capacity without disadvantaging viewers with existing equipment.

We welcome the flexibility offered by the DTT platform in terms of availability of and access, free-to-air, to Public Service Broadcasting and the further opportunities to provide access to a more varied set of services, including High Definition is a welcomed use of both spectrum and new technology.

The particular proposals on how this complex technological task can be implemented will no doubt be commented on by those professionally qualified to do so. The logistical steps proposed provide confidence that one effective solution exists, and that it can be an achieved within an acceptable timetable. It is important that decisions on method and timetable are not delayed and that the implementation goes ahead on schedule; any delays could well affect the confidence of consumers and citizens on the whole complex series of changes involving the allocation of Spectrum, the upgrading of DTT and indeed DSO itself.

We note (Section 1.39) that “S4C, the Gaelic Digital Service (GDS) and TG4 will be available on a PSB multiplex in, respectively, Wales, Scotland and Northern Ireland (subject to any other agreements or consents required) ...”, and we welcome this.

We also note in paragraph 1.20 the comment “ ... the existence of extra capacity on the DTT platform at DSO is so important – because it will enable new services to be offered, using new technologies, with out having to reduce the availability of existing services using existing technologies.” The existing services available to consumers and citizens in Northern Ireland do, however, spill over, seamlessly, to services which lie outside the responsibility of Ofcom. Nevertheless we would seek to ensure that the significant benefits of the DTT platform and DSO were not perceived as causing other existing services to be reduced.

Specifically one issue which is not raised in the consultation, but which Ofcom may wish to consider in the context of DSO, is the likely effect of DSO on the availability of free-to-air Republic of Ireland channels in Northern Ireland. At present, Radio Telefís Éireann (RTÉ) channels are available in Northern Ireland via cable, satellite, and analogue spill-over from terrestrial transmitters in the Republic. We understand that an estimated 70-75% of the population in Northern Ireland can receive RTÉ, including 50-55% who can receive it off-air. While spill-over will continue in the digital environment, it will not be able to reach as many homes as now. We understand that Ofcom NI staff have been

apprised of concerns about the possibility of RTÉ not being as widely available post-DSO as it is now, by politicians from across the political spectrum.

One factor is that as DSO is not scheduled for Northern Ireland till 2012, so that public awareness of the issue is as yet relatively low. A concern is that there may be a sudden realisation, at a late stage, that these services will no longer be available to many, leading to a political problem. The loss of audio services may also become an issue. While we understand that there is no entitlement to continued reception of a spill-over service, we are aware that, in a reverse situation, attempts to close down “deflector” services in the Republic in the 1990s (which made UK terrestrial channels available in non-cabled areas on payment of a voluntary contribution) caused a public outcry and were met with fierce opposition, including the election of a “deflector candidate” to the national parliament. We feel that any situation involving the loss of a currently available services is best avoided, if possible. Obviously, any possible solution to this problem would raise issues which go far beyond Ofcom’s remit; however, we would encourage Ofcom to support efforts to find a resolution.