

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?:

PVR is the growth area in Digital TV IMO, while I believe additional interactive streams from PSB's other than the BBC would enhance the platform, but HD wise content from the BBC especially, and ITV and C4 would be the main selling force.

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?:

Yes, but as long as current equipment does not become obsolete and that the quality and number of existing channels isn't adversely affected by these changes.

On paper all channels may fit into a new arrangement, but in reality quality could be affected. We already see this to some extent with Mux 2 and Mux A, which are much more vulnerable to reception problems than the other muxes on DTT.

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?:

Not one single channel should be lost to current Freeview viewers as a result of a switch to DVB-T2 / MPEG-4 - so this has to be considered in consultation.

I do believe though long-term HD viewers would expect more than the 4-5 HD channels currently proposed, especially as HD becomes the norm.

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

It is a priority and important to consider, but I think long-term the platform could suffer from adapting technologies as soon as they are available.

The proposal to me seems adequate as a short term solution, but long term there seems little room for growth for both SD and HD channels.

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?:

Yes.

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?:

Yes - though I believe that intervention would be better in the form of a seventh mux being made available after DSO - and then perhaps once we are sure the technology can cope with what is required, realigning services from the seven muxes to six.

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?:

A seventh mux for the purpose would be preferable, but the proposals show clearing Mux B could be a feasible solution.

However, I think this HD PSB mux should be in addition to the three existing PSB muxes, with current SD channels from BBC, ITV, C4, S4C and Five split over three muxes.

Other Freeview channels would then be split over the two remaining commercial muxes (C & D).

This seems more sensible to me as basically currently 3.5 of the muxes can be classed as PSB services, with 2.5 as commercial. Fitting 3.5 into 3 and 2.5 into 2 seems more sensible than squeezing 3.5 into 2.

With 9 BBC channels, 5 from ITV, 6 from C4, 3 from Five and 2 from S4C, I believe three muxes would easily be sufficient for 25 channels from PSB broadcasters.

This leaves eight channels on Mux C/D, plus upto six from Mux A, to be rearranged on an upgraded Mux C/D - which with the planned upgrades should also allow for possible additional SD channels to join Freeview as well.

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.

Mux 2 is already at the capacity the BBC are targetting for Mux 1 after DSO - and DSO should allow for problems with reception from Mux 2 to be addressed first, rather than the addition of channels.

The solution IMO is to assign Mux A as an additional PSB mux, carrying the services from Five and S4C as they do now, plus the ITV and C4 services currently on Mux C/D, in addition to any BBC service which cannot be accomodated on Mux 1.

Setanta Sports, Top Up TV and the remaining shopping channels could then easily be homed on Mux C/D by using the upgrading technologies available.

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 - see Q11.

The issue is that though on paper all the channels should fit, in reality it could be different.

Mux 2 and Mux A are the services most viewers have problems with - and priority for DSO should be to address these issues before considering additional channels.

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

In principal I agree clearing Mux B is a viable solution to providing HD on Freeview, but as stated in Q9 and Q11, I believe an additional mux needs to be reserved for PSB SD broadcasts for the plan to be more robust.

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

Yes.

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

As outlined in Q9 and Q11.

Basically Mux 1, 2 and Mux A are dedicated PSB SD muxes, Mux B is a PSB HD

mux and Mux C/D are for other SD channels.

Mux 1: As proposed BBC Four, BBCi 301-303 and BBC Radio relocate to Mux 1.

Mux 2: remains as currently split between ITV and C4, but new technologies are used to focus on ensuring the quality of the mux is sufficient.

Mux A: Five and S4C remain on Mux A, with E4+1, C4+1 and ITV2+1 moving from Mux C/D to create a third PSB mux. BBC Parliament is also moves from Mux B to Mux A.

Mux B: HD mux, as proposed.

Mux C: The remaining four channels on Mux C are joined by the four channels from Mux D.

Mux D: Non PSB services from Mux A including Setanta, Top Up TV, QVC and other shopping channels relocate to Mux D. With the upgraded system there should be the option of launching at least two further channels on the Freeview platform here too.

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

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?:

HD on Freeview must be secured for Free to air broadcasts, and the main partners in Freeview - BBC, ITV and C4 - should have first priority.

OFCOM should also encourage the broadcasters to work together so that when one service is not broadcasting HD content, another is able to use the spare capacity if it requires more than one channel.

i.e. during the day for BBC Sport, when ITV and C4 may not be showing HD content it would be in the viewers interest if these were used by the BBC for an event such as Wimbledon or the Olympics instead when one stream might not be sufficient.

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?:

Yes.

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?:

I believe the risk to the quality of Mux 2 especially hasn't been addressed convincingly.

It is important that these quality issues with existing services are fully addressed in time for DSO when viewers will not have the option of reverting to analogue ITV1/C4 when picture quality is insufficient.

This issue is generally answered by a belief that there should be less interference come DSO - but that needs to be proved before proceeding with plans for more channels on the mux, perhaps by using areas which have already switched to digital on a trial basis.

Additional comments:

Everything I want to say is addressed, but these consultation documents can be unnecessarily confusing - seemingly repeating many questions and in some cases using technical jargon which prohibits the ordinary viewer from answering some questions correctly and truthfully.