

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?:

No comment

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

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?:

Early adoption of new technologies can be expensive for the industry and consumers. There is a balance to be struck between the higher risks and costs of early adoption and the benefits that the new technologies will bring.

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?:

No comment

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?:

Yes

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

The proposals are built on assumptions that future technological developments will allow the new services to be accommodated without degradation of the quality of existing SD channels.

Safeguards are required to ensure that if technological progress is slower than predicted, the quality of existing channels will not be compromised. The whole premise of the upgrade argument is that better quality (HD) is desirable. Therefore, any threat to existing quality must be resisted.

It is important that contingency arrangements are in place to ensure that the easy option of squeezing more channels into other multiplexes by small reductions in quality is not tolerated.

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?:

See 9

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?:

See 9

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

See 9

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?:

The BBC has demonstrated that it has the vision and ability to develop digital terrestrial . The success of the Freeview platform is in stark contrast to the failure of its commercial predecessor. Therefore, the BBC should lead the allocation of multiplex B but with a requirement to work with commercial operators to best serve the public interest. It should be required to satisfy OFCOM that it is discharging this responsibility.

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?:

No comment

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?:

No comment

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:

Caution needs to be exercised when considering research that suggests consumers want more SD channels. There is likely to be an assumption that more channels means expanded choice. However, anecdotal evidence suggests that few who take the non-premium content on Sky (i.e. non sport and movie) consider it a better proposition than Freeview. A proliferation of +1 and shopping channels will not be appreciated by many.