

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 services

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?:

I agree that this is the logical 'technology' option but see later comments.

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. The UK is already some way behind the U.S. and some European countries in the broadcasting of terrestrial HD services.

Surely, the aim should be to broadcast the 2012 Olympics in HD?

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?:

Ofcom needs to make the general public aware that existing DTT receivers and set-top boxes will not be capable of receiving terrestrial HD services.

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?:

See my response to Q4.

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?:

Has any consideration been given to 'pairing' existing broadcasts to provide additional capacity for HD services?

Does the general public really need, or want:
BBC1, 2, 3, 4 CBeebies, CBBC & News 24?
ITV1,2,3,4 and the '+1'services?
C4, E4, More4 and the '+1'services?
Five, Five, Life & Five U.S.?

By intelligent pairing of services for all or part of the day, the whole problem of capacity for HD could be resolved at a much earlier date and the benefits of technological advances introduced later.

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?:

Yes, but see my response to Q4 and comments.

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, in principle, BUT has any research been done into the ruggedness of 64QAM transmissions compared with 16QAM?

It is vitally important that practical considerations such as this are taken into full account. Many people currently suffer from 'break-up' of digital transmissions due to lack of signal strength, interference and other causes.

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

This is one option but see comments in response to Q7.

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.:

See response to Q7.

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

HD must be given priority in order to avoid the problem of the UK being left behind by other countries.

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?:

Proposals should be mandated but Ofcom must be receptive to other proposals from broadcasters and elsewhere.

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

No

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

Broadly, but see response to Q5.

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?:

Broadly, but recognition must be given to the changing world in which we live and Ofcom must be prepared to adapt it's approach and proposals accordingly

Additional comments:

The impact of satellite HD services (via Sky or FreeSat) must be taken into full account and the public made fully aware of these options.