Title:

Mr

Forename:

Chris

Surname:

Archer

Name and title under which you would like this response to appear:

Chris Archer MIET

Representing:

Self

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1:To what extent do you consider that DTT, DSat, cable and IPTV are in competition with one another for subscribers of pay TV services ? either at present or in the future?:

All platforms are in competition with each other. Today the main competition is cable/Dsat but hopefully IPTV can emerge as a strong competitor. DTT, because of its limited bandwidth, is a much weaker competitor - its current strengths being subscription free channels and low cost of equipment

Question 2:To what extent do you consider the Proposal is likely to deliver benefits to the consumer?:

On balance, I do not see any benefits to the consumer. This is simply a duplication of some existing services onto a different platform with the consequence that some services are going to disappear for many customers. DTT does have a slight advantage that it is marginally easier to install that satellite/cable but in terms of cost/channel is seems poor value (although I realise that poor value is not a regulatory consideration).

Question 3:To what extent do you consider that there is scope for sustainable competition in pay TV on the DTT platform and, more broadly, across all pay TV platforms?:

On DTT there is limited scope simply because of the limited bandwidth. Hence my desire to see Pay-TV restricted on the current DTT multiplexes. However there is nothing to stop future competitors buying freed-up bandwidth and broadcasting pay TV once the analogue switch-off is complete.

On other platforms, cable/Satellite compete on breadth of coverage but apart from the recent Sky One/Virgin arguments they are effectively showing the same package and thus compete on price. IPTV would appear to offer the appeal of limitless on-demand choice which cable could also offer but satellite cannot. So there would appear to be future scope for further differentiation and competition.

Question 4:What are likely to be the key aspects of competition between providers of retail pay TV services on the DTT platform? E.g. what is the role of premium sports and movies content?:

Given the chance, I'm sure pay TV providers would be happy to compete in all areas. However, I don?t think there is the space to do this on DTT without significantly diminishing the choice available to non-pay basic DTT customers.

Question 5:Do you consider that if Sky were to become the only provider of pay TV on the DTT platform it would be likely to have a significant detrimental effect on competition in the long term? How might this affect the development of other platforms for the delivery of pay TV services?:

In terms of Pay-TV competition then I don't see this as a problem. Requiring people to buy a special box and pay a subscription to get a handful of channels does not sound like a serious threat to competition.

Question 6:To what extent, if at all, do you consider that the Proposal would be likely to lead to any of the public policy concerns outlined at Section 4?:

I believe that the general public perception is that you pay for Satellite and Cable but terrestrial TV is free. Life is obviously not that simple but with the impending digital switchover, where consumers are being forced to take decisions about a subject they probably don?t fully understand, it does not help to make things more complex still.

My preference would be to defer any extension of pay-DTT until the switchover is complete and then restrict it to frequencies purchased by broadcasters over and above the existing allocated multiplexes. (I realise this proposal is probably outside the scope of this consultation).

I agree that the term "freeview" is seen as synonymous with "DTT" and in persuading people to migrate to "digital" this is probably no bad thing.

Question 7:Specifically, to what extent do you consider that the Proposal would be likely to lead to consumer confusion?:

DTT is seen as the "simple" way of getting TV once analogue vanishes. It will be the default system for most receivers, and the only option available for many devices (e.g. portables) and should just work "out of the box". If consumers find that they have to choose different receivers for different companies' services then there is bound to be additional confusion.

Question 8:To what extent do you consider that it is beneficial for consumers to be able to obtain Sky and existing DTT pay TV content without having to purchase separate STBs?:

Standardisation is important in any market to promote competition. If a standard pay-tv enabled receiver can received other services with the right card then there is a likelihood that consumers will swap between pay-tv providers and thus there is additional competition. If a receiver only works with one company's services then there is a significantly barrier to moving to another supplier and competition is reduced. Therefore I do not believe that a proprietary standard should be introduced.

There is also the question of international standards. DTT, as used in the UK is a world standard (with the usual exception of the US). Suggestions such as new encoding and encrypting standards should only be permitted within the framework of existing international standards. Such efforts will ensure economies of scale and thus reduced equipment costs.

Question 9:Do you consider that the Proposal might lead to any additional public policy concerns:

Once the analogue switch-off is complete, DTT becomes the "default" method of receiving TV. The basic set you buy for the bedroom, the cheap portable for holidays or bet-sits, the PVR, the USB card in the PC will all be basic DTT sets. Customer expectations are that these will be able to receive a broad range of channels. If spectrum is be chipped away to provide a variety of pay-tv services then customer choice will become severely limited. For these users, there will be no alternative to DTT and they cannot move to a different platform to access displaced channels nor can then pay a subscription to get the extra channels as their basic equipment will be incapable of decoding the channels.

I therefore believe that increasing pay TV on DTT will restrict consumer choice and should not be allowed to proceed at this stage.

Once analogue switch-off is complete, the pay-TV companies can purchase additional spectrum and broadcast their own programmes there. For now the existing multiplexes should remain as they are without further pay-TV additions.

Question 10:If Sky becoming the only provider of pay TV services on the DTT platform were likely to have a significant detrimental effect on competition, do you consider that it is possible to address this through a set of additional conditions and/or directions? If so, what form should those conditions/directions take?:

In the Pay-TV market, DTT is just one of the platforms and so I do not see this as affecting competition. My concern is the presence of significant amounts of Pay-TV, from any supplier, on the DTT platform.

Additional comments: