

Title:

Mr

Forename:

Ed

Surname:

Manning

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

Ed Manning

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?:

DTT, DSAT, Cable and IPTV are technologically different and have limitations implicit within them. DTT has the advantage over the others that it is relatively cheap and simple to receive. In the future most TVs will have Freeview built in. However it does not have the bandwidth to compete on subscription, and more encrypted channels means less Free To Air.

DSat currently competes for programming with all channels. The major competition is in the field of purchasing programs where pay TV has the ability to wipe out Free To Air.

The dominance of Sky destroys competition.

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

None whatsoever. It will increase Sky's dominance and reduce rather than increase competition.

It will enable Sky to get FTA channels off Freeview and destroy FTA DTT in the way that it has severely damaged the development of FTA DSat in the UK.

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?:

The problem is program rights and copyright. This enables broadcasters to force viewers to pay for programs that they used to receive FTA, and forces viewers to pay to receive what they previously received for free.

There is not the bandwidth on Freeview and with the advent of HD, even after analogue switch off there will not be the bandwidth.

Freeview has been a great success and this proposal could destroy it.

FTA only on DTT works, the idea of changing it is not in the consumers interest.

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?:

Premium moves and sport can either be purchased on DSat or through IPTV. If you can afford premium content then you can afford either IPTV or DSAT.

I cannot see any reason to put premium content on DTT, when there are so few people who would not be able to receive it through satellite, IPTV or cable.

It seems pointless duplication.

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?:

Yes.

Sky is too dominant. Rather than looking at giving it more power, it should have its power reduced.

Because of Sky I can see less sport and I see films later on TV. Pay TV is not neutral on those who do not watch it. Pay TV drives out good FTA TV. If it was not for the competition from the BBC the situation in Britain would be even worse.

Pay TV is not a social good. For those who want it there is bandwidth on DSat and IPTV. It should be kept off DTT.

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?:

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

For most people DTT is Freeview, and people have bought the boxes on that basis. Giving to Sky is taking from them.

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?:

None whatsoever. If you can afford a subscription Sky will basically give you the equipment and installation. Therefore no one purchases the equipment.

Except if Sky can afford to give away the boxes and the other provider cannot that could lead to the other provider being wiped out.

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

Yes.

There are political issues with the power of Sky, indeed there are doubts that if Sky was not so powerful politically if we would even be considering this.

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?:

It is not possible to address the problems caused by Sky having too much power on DTT, except by forcing them to broadcast FTV.

Additional comments:

I am deeply concerned that this could damage Freeview, and that that is exactly what Sky wants to do.

Freeview has competed with Sky, indeed it is the most effective competition with Sky. Therefore to give in to Sky would decrease rather than increase competition and therefore would be bad for viewers.

Pay TV needs to be carefully regulated otherwise it can damage the experience of those who do not want to pay for their TV. Freeview has worked very successfully, to undermine that success could be disastrous for FTA TV in the UK.