

Title:

Mr

Forename:

Irvine

Surname:

Rodger

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

Mr

Representing:

Self

Organisation (if applicable):

NA

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?:

Freeview is in competition with SKY. It attracts those of us who want multi-channel TV but who don't want to fork out for subscriptions and/or satellite receiving equipment.

By allowing this plan to succeed the choices for those of us who want free-to-air TV will be reduced.

The strength of the non-subscription alternative to SKY satellite would be harmed

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

None at all.

Freeview is in competition with SKY.

If this plan succeeded, free-to-air digital terrestrial tv would be weakened and the already dominant multi-channel operator, SKY, strengthened.

Not a happy prospect for those of us who want our TV free.

It is not as though people could not get their own subscription from SKY easily.

If Freeview viewers wanted to pay for TV they would already have done so.

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 terrestrial platform is limited compared to the 100s of channels on SKY. Consequently for good technological reasons, there will NEVER be equal competition across all platforms.

The more that terrestrial stations are hived off to the dominant multi-channel operator, SKY, the less choice for viewers.

The Channel 4 option of converting previous subscription channels like E4 and FilmFour is the way forward. Much greater audiences supported by advertising.

The very notion of trying to treat Freeview an equal platform to SKY is absurd

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?:

There is no role for subscription sports and film content. If viewers wanted, they would

be able to pay for a subscription and satellite equipment.

Freeview does not have the bandwidth to offer umpteen channels. For every station lost on Freeview to the dominant multi-channel tv provider, SKY, the more that viewer choice is reduced.

Surely it is not Ofcom's role to oversee a reduction in choice?

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?:

For all the reasons noted above, YES (

For the avoidance of all doubt, we don't need competition in the subscription market on digital terrestrial either!

As I said, if people want subscription tv, they know where to go. Such plans should not be allowed to destroy the small platform which is Freeview.

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?:

My answers above provide, with reasons, the reasons why public policy is in peril.

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

A lot. Freeview would have to change its name for a start

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?:

New TVs already have the digital channels integrated so there is no need for an STB.

If this proposal went ahead, I would need to either buy an STB (unlikely) or have to write off the channels as lost to the viewer forever (more likely).

Not exactly progress,

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

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?:

SKY is already dominant.

Why would we want to increase it further?

Additional comments:

Freeview was designed for people who didn't want satellite subscription TV

Why would we want to destroy that little bit of public good by increasing the sheer dominance of SKY even further?