Question 1: What are your views on Ofcom?s proposed three-year strategic policy framework?:

It appears that most of the key issues have been identified and included in the strategic framework. However for the item ?Moving towards more consistent legal and economic frameworks? it is considered that a more active approach should be taken during 2007/8. This is due to the fact that there will be a number of developments taking place in the near future which could have an impact on the various frameworks and Ofcom should be ready for the changes rather than reacting after the event when it may be too late. For some of the other items it may be appropriate to review the work items to ensure that they are fully comprehensive and cover all aspects of the topic.

Question 2: What are your views on Ofcom?s proposed priorities for 2007/8? In particular::

No comment

Question 2a: What are your views on the work which Ofcom should do in 2007/8 to drive a market-based approach to spectrum?:

A more active approach needs to be taken towards the implementation of spectrum liberalisation and trading and any barriers to successful implementation need to be identified and addressed. Additionally consideration needs to be given to the possible introduction of more generic spectrum usage allocations so that for example the current separate mobile and broadband spectrum allocations could be replaced with a new connectivity allocation. Such generic allocation would better represent the convergence that is taking place between applications making the emergence of new services and application easier. It is possible that with the introduction of technology neutral spectrum awards and concepts such as Spectrum Usage Rights that generic spectrum usage allocations are not required but it is felt that the benefits of such an introduction should be considered.

Question 2b: What are your views on the work which Ofcom should do in 2007/8 to develop new ways to deliver public outcomes as platforms and services converge? :

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Response
It is important to ensure that everybody has access to the full range of services and platforms that are available and this access includes the ready usability of the services and platforms.

Ensuring general access is not just an issue in rural and remote areas as in some city areas there is low usage of landlines with mobiles being the preferred means of access which may create various issues. The implications of this particular means of access in city areas need to be investigated to ensure that such users are not disadvantaged.

The ready usability of services and platforms could require the introduction of different ways of interacting with interactive devices and there may be a need to implement alternative interaction procedures for people with special needs. The scope of Ofcom?s role and involvement in this area needs to be considered together with the most appropriate means for Ofcom to ensure that any required action is taken.

Thus it can be seen that there are a number of complex issues to be addressed and Ofcom?s role in these areas needs to be carefully defined.

Question 2c: What are your views on the work which Ofcom should do in 2007/8 to improve business compliance and empower consumers? :

No comment

Question 2d: What are your views on the work which Ofcom should do in 2007/8 to promote competition and innovation in converging markets?:

There is a need to better understand how the platforms and services will evolve and where we are in relation to other countries. An example of this is that there is concern that the UK is investing less in NGN access networks than some other countries. One of the countries quoted is France but study indicates that the French market is completely different to the UK market
? In France the second largest broadband provider currently does not have its own network whereas the UK the second broadband operator does have its own network
? In France the characteristics for watching television and consuming video content appear very different to the UK pattern
? The usage of mobiles follows a different pattern in France to that observed in the UK.
Similarly for other countries that are investing in NGN access network the market characteristics are different to those found in the UK market. Thus there is a need to understand how the UK market will evolve and the resources required to support this unique evolution rather than assuming that the UK evolution will require the same resources as those needed in other countries.

Question 3: Are there additional areas where Ofcom should reduce regulation and minimise administrative burdens? Please provide specific examples.:

No comment

Comments: