



## **RESPONSE OF CHANNEL 5 BROADCASTING LTD TO OFCOM CONSULTATION ON FUTURE USE OF THE 700 MHZ BAND**

Channel 5 welcomes the opportunity to respond to this consultation. Our main concern in doing so is to argue that the process of moving DTT out of the 700 MHz band should be organised with minimum disruption to DTT viewers and providers of DTT channels; and that the costs of the transition should not be borne by broadcasters or consumers, as they will not be the beneficiaries of such a move.

As Ofcom recognises, 40% of households rely on DTT for the linear reception on their main television set, while altogether over 75% of households use DTT. DTT also underpins free-to-air television and public service broadcasting, including Channel 5. Maintaining a robust DTT platform should be a primary objective of the re-casting of the UHF spectrum.

We are not well placed to assess the benefits of devoting the 700 MHz band to mobile broadband, but whatever these may be, they need to be set against both the economic and social benefits of maintaining a strong DTT platform.

Channel 5 welcomes Ofcom's continued recognition of the DTT platform's roles in "providing low cost near-universal access to PSB services and in sustaining viewer choice of services, platforms and equipment"<sup>1</sup>; and hope Ofcom is correct in believing that it will be possible to "develop a frequency plan which allows for the continued delivery of PSB coverage, reach and range of services similar to today through six national multiplexes"<sup>2</sup>.

However, we would be concerned if the re-planning of the spectrum were to result in a loss of coverage, however small. Any loss of coverage, whichever multiplexes suffered it, would represent a loss of service to some viewers and a weakening of the DTT platform as a whole.

We would be particularly concerned if the commercial multiplexes suffered some loss of coverage while the three PSB muxes' coverage was protected. Channel 5's guaranteed capacity sits on the commercial muxes, while the guaranteed capacity of the other public service broadcasters is on the PSB muxes. If the commercial muxes' coverage was reduced, this would impact disproportionately on Channel 5 compared to the other public service broadcasters which provide our main competition.

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<sup>1</sup> condoc, paragraph 5.11

<sup>2</sup> condoc, paragraph 5.25

While the experience of digital switchover (including clearance of Channels 61 and 62) was remarkably smooth, it cannot be assumed this will be replicated in the next spectrum move unless there is adequate planning and funding. We are particularly concerned at the possibilities that bilateral negotiations do not go as well as Ofcom currently hopes; that reconfiguration of the network leads to disruption and loss of service, with consequent undermining of confidence in the platform; and that the aerial replacement scheme and information and communications plans are not adequately funded. We also believe specific provision should be made to support vulnerable viewers who may find retuning difficult.

A further concern is the lack of headroom for future development of the DTT platform that will result from the termination of the two temporary multiplex licences and the failure to mandate a change to DVB-T2/MHEG-4 transmission and encoding technologies. Ofcom needs to accept that, to remain vibrant and relevant to a mass audience, the DTT platform needs to have room to develop in the long term.

Finally, we believe strongly that the costs of the clearance process should not be borne by DTT broadcasters or their viewers. The benefits of 700 MHz clearance will accrue to the mobile operators, their customers and the country as a whole. Therefore, either the mobile industry or the government (or some combination of the two) should pay the full costs of clearance.

*Channel 5 Broadcasting Ltd*

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