Name withheld

Additional comments:

Question 1:Do you have any comments on Analysys Mason?s approach to quantifying the network cost savings and performance benefits?:

We have no evidence to contradict the approach, but we can comment from a visual market perspective that the launch of services in the 800 MHz band did not really provide any cost benefits to consumers just an additional higher contract tariff for 4G services. There is no evidence in this report to establish if the predicted benefits for the 800 MHz have actually been analysed in the context of justifying the accuracy for 700 MHz predictions.

Question 2:Do you have any comments on the other benefits we have identified including the likely magnitude or how they may be quantified?:

No comment

Question 3:Do you agree with our assessment of the likely benefits of changing use of the 700 MHz band?:

We do not see the use of the centre gap for PSME communications as a benefit; we see this as a consequence of the change. The centre gap is only present, due to the inadequacies of the technology being used. If the gap was not needed then 25 MHz would be available elsewhere for such devices in other areas of the spectrum

Question 4:Do you have any comments on our analysis of the implications change of use of the 700 MHz band would have for the DTT platform?:

We disagree that the consumer costs to upgrade to a DVB-T2 only network is high. A number of Manufacturers no longer make a DVB-T only receiver and this has been the case for a number of years. The consumer demand for HD is significant and with co-operation from the industry the consumer could be migrated to DVB-T2 without knowing. By simply regulating that T2 only receivers can be sold in the UK at an early stage would fit in with plans to move out of the 700 MHz spectrum from 2020. Italy is already planning such an approach. We perceive the cost of this is more on the network providers as we anticipate that the migration would be to a H.264/DVB-T2 solution and not an MPEG2/DVB-T2 solution. This direction would also provide efficiency gains for SD channels. Potentially this could be (partially) subsidised by the sale of the 700 MHz spectrum.

Question 5:Do you agree with our assessment of the likely costs of upgrading DTT transmission infrastructure?:

No comment.

Question 6:Do you have any comments on our assessment of the timeframes within which it might be possible to complete a DTT replan?:

No comment.

Question 7:Do you have any comments on our assessment of the loss of value from existing DTT services in case of change of use for the 700 MHz band?:

We believe that the loss of spectrum will have impact for the future of DTT network. The industry is constantly working on new technologies to deliver AV content to the public and we believe that by 2018, if not earlier, the emergence of Ultra HD services will become a reality. This will drive the need for more spectrum. If insufficient spectrum is available for experimentation and new services then this will drive the consumer to TV services elsewhere such as Satellite, Cable and possibly IP. Based upon the current UK market, this will force the consumer to a Pay TV service rather than the current FTA service that the UK public currently benefits from. This could also impact sales in the industry and retail market. Again we disagree that the considered upgrade costs for a DVB-T2 network is largely driven by the purchase of new equipment by the consumer. We would like to re-state that a number of manufacturers and retailers only sell DVB-T2 capable receivers and demand for HD receivers indicate that such migration for the network can be achieved without significant cost impact to the consumer. As mentioned earlier, a change to the UK regulations to mandate the support of DVB-T2 in all receivers would minimise or possibly eliminate the impact to the consumer at the time of migration of the DTT network out of the 700 MHz spectrum. The additional consumer information costs could be negated if such regulation is put into place, but such transition is not considered in this document to be a benefit to the UK economy with the stimulation of sales to a similar extent that we saw with the DSO project. The use of a PVR product is diminishing based upon the availability of catch-up services and with the fact that numerous TV receivers have recording capability. The cost of T2 STB's and PVR's in 2014 is already close to the report's estimates.

Question 8:Do you have any comments on our analysis of the implications of potential changes for DTT viewers and for the platform? Are there any effects that may be important to viewers that we should consider further?:

We think there is sufficient evidence from previous experience (the DSO process and from the 800 MHz migration) on how the UK consumer manages change in the DTT network. However, we believe that the possible impact from interference maybe different to that of the 800 MHZ. This time the source of interference will be the handset and although the potential for direct signal injection into the receiver is less, the possibility of interference based upon proximity to the receiver could be higher and by-pass any filtering mitigation solution.

Question 9:Do you have any comments on our consideration of consumer information and support measures and on the factors we should focus on in the next stages of work?:

We believe based upon past experience the communication network for such network changes is sufficient. However, this is not to say that such communication and support to consumers should be reduced in anyway. We also agree with the comments made by Digital UK Channel 5 and Freeview in the 2013 CFI, that the costs of the network changes, such as communications and co-existence mitigation, should be funded by the mobile operators.

Question 10:Do you have views on the activities that Ofcom and other stakeholders could undertake now to help ensure that DTT equipment that consumers might buy in the coming years is as future-proof as possible?:

We believe that Ofcom and other stakeholders should take the opportunity to mandate receivers in the UK market that support DVB-T2. However, in relation to imposing higher receiver performance regarding RF interference, this has to be considered carefully. We understand that numerous parties, including ourselves, disagreed with a report commissioned by Ofcom which suggested that the performance improvements can be made without significant cost increase to the equipment. The receiver market is, as it stands, marginal in terms of sales profit and where prices are continually reducing, any material cost addition must have impact to the consumer.

Question 11:Do you have any comments on our assessment of the impact change of use of the 700 MHz band would have on PMSE?:

No comment

Question 12:Do you have any comments on the mitigations for loss of access to the 700 MHz band including whether we have correctly identified the replacement bands suitable for further study and whether we have correctly identified actions that the PMSE industry could adopt to improve spectrum efficiency?:

No comment

Question 13:Do you have any comments on our assessment of the impact of the change of use of the 700 MHz band on the TVWS availability?:

No comment

Question 14:Do you agree with our use of the Spackman method for discounting both the costs and benefits of change of use?:

We have no comment on the Spackman method, although we again question the lack of evidence which justifies the claim that the consumer receives lower costs for and expanded mobile network service.

Question 15:Do you agree with our approach of estimating the cost of early replacement or should we be considering the full cost? Do you have any comments on how we have estimated the costs of early equipment replacement? :

We do not agree that consumers would stop watching DTT on additional TV's in respect to the main TV in the household. Our opinion is that many households with additional TV's already have multiple aerials or an internal RF distribution amplifier. We anticipate that additional TVs will be continued to be used for DTT services.

Question 16:Do you agree with our overall assessment of the costs of change of use of the 700 MHz band?:

Again we raise the issue of interpreted receiver costs to the consumer if a change to DVB-T2 was planned. The vast majority of manufacturers and retailers sell only Freeview HD products which are already DVB-T2 compliant. We believe that a regulation change or even a change of approach from Freeview will accelerate the consumer purchase of DVB-T2 compliant devices over the period from 2015 to the changeover of the 700MHz spectrum.

Question 17:Do you have any comments on our assessment of the impact of earlier or later change of use of the 700 MHz band?:

No comment

Question 18:Do you agree with our proposal that we should make the 700 MHz band available for mobile broadband?:

Not entirely, we can agree with the general plan for 700Mhz re-use but only if the 25 MHz band gap is re-used either for PMSE and/or WSD and that the remaining allocated television spectrum is migrated to DVB-T2 to provide sufficient spectrum to support the expansion of HD services and in the future UHD services.

Question 19:Do you agree with our proposal that we should seek to implement this change at the earliest possible opportunity?:

We agree that the process should start at the earliest opportunity but the change process should not be based solely upon time. It must take into account mitigating factors such as cost impact to the network providers and timing impact to the consumer, especially in relation to key/important events.

Question 20:If, as a result of this consultation, we decided to go ahead with the proposed changes, what factors and evidence should we take into account when considering whether to hold an auction near to the time of availability of the spectrum or earlier?:

No comment