



Digital Dividend: Clearing the 800MHz Band

Institute of Broadcast Sound: Consultation Document Response.

The IBS recognises the desire by OFCOM to implement the pan-European proposals for harmonization of the 800MHz band for future mobile services and the consequences that this will have for existing UK DTT services and the UK PMSE industry.

The IBS agrees with OFCOM's hybrid approach to the changes to existing UK DTT services in that it will minimise disruption and cost to existing viewers of these services and provide a satisfactory outcome. We are not competent to make any further observations with regard to Q1 – Q7.

The IBS is pleased to note OFCOM's realisation of the needs of the UK PMSE industry particularly in respect of channel 69, and the consequences should a suitable replacement not be found. We agree with OFCOM's assessments covered in Section 5 and the questions raised (Q8 – Q10).

The IBS agrees with the proposal that channel 38 offers a suitable replacement for channel 69 given its proximity to channels 39 & 40. As these channels will now form part of the UK DDT service provision they will, along with channel 38, replicate the spectrum access previously enjoyed by PMSE in channels 67,68 &69. From a technical point of view a suitable guard band at the top of channel 37 may be required to protect PMSE from what ever new service is licensed in channel 37, thus enabling PMSE to fully utilise channel 38 on a UK wide basis. The IBS notes that OFCOM now recognises that the post DSO interleaved spectrum will not be sufficient or suitable on its own to support continued PMSE activity in the UK. (Q11)

The IBS agrees that channel 38 should be awarded to the new band manager in exactly the same manner that was previously proposed for channel 69 and the manager must have the same licensing ability for the digital interleaved spectrum in channels 39 & 40.(Q12)

As the Professional User Group has previously discussed with OFCOM the timetable for many of these changes impact most noticeably around the time of the UK Olympics and Para-Olympics and therefore it is essential that the implementation of the new licenses in the cleared spectrum are delayed until the Olympics are completed. This will enable the UK stock of existing PMSE equipment to be fully utilised for the Games. (Q13)

On the issue of timing and funding of the re-equipping/ re-engineering of existing channel 69 equipment we take issue with 2nd February 2009 being the cut off date for

eligibility for future financial support. As OFCOM is only too well aware there are many professional and community users who will have little if any knowledge of the consultation document and would therefore suffer an undue penalty if OFCOM remains committed to that date. Similarly as many professional users and hire companies will have to renew stock, this will currently be for use in channel 69, before OFCOM officially confirms channel 38 as the replacement for channel 69. It must be recognised that the 2nd February date is not reasonable given the current situation. The IBS along with the Professional User Group wishes to enter into a meaningful discussion with OFCOM on this particular issue and also the level and mechanisms for deciding funding. Given the likely size of the receipts from the new 800MHz licenses, and the fact that it is the PMSE industry that has to move to other spectrum, not of their own will, it is beholden of OFCOM to take a supportive role in this massive change. We therefore do not agree with the statements relating to Q14.

On the subject of the 3 year timescale for PMSE to re-equip/engineer to channel 38 we believe more information is required, particularly from manufacturers, as to the feasibility of meeting this timetable. Given that we are still in a consultation period and OFCOM has not stated officially that channel 38 will replace channel 69 the 3-year timescale is already down to 2½years. The mention of an extension to 2013 is looking ever more likely. We therefore have doubts regarding Q15.

The IBS remains committed to continuing discussions with OFCOM to reach a satisfactory outcome for the DDR and the UK PMSE industry.

The Executive Committee
The Institute of Broadcast Sound.

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