

Additional comments:

None

Question 1: Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?:

Yes, we believe that clearing this band as proposed will ultimately further the interests of consumers and citizens.

Question 2: Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.:

Given where the DSO program is at the moment and the rollout time table, we believe this is going to be an exceptionally difficult task to achieve. The ultimate criteria must be the protection of the viewers services, the minimization of the ensuing disruption that this will inevitably cause, and the proposal must ensure that there is no undue financial impact on the broadcasters or the viewer.

Question 3: Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?:

We do not believe there are any superior options that would be viable.

The hybrid option is the most consistent option. However it also requires the largest number of re-tunes by the viewer. Experience to date has shown that retuning has given.

Question 4: Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most consistent with the DTT migration criteria? If not, why not?:

We are concerned that any extra work other than the obvious easy wins during the DSO program will have an undue affect on the process and could derail the delicate and complex process that is under way. The very act of analyzing where DSO integrated implementation is possible on a site by site basis will require extra resource to be made available, otherwise it will adversely impact on the already overstretched planning resources.

Question 5: Do you agree that a programme-control and -governance arrangement such as that outlined above is appropriate?:

We do not see any other way to harmonise the scarce resources that are tied up in the DSO programme with the objectives of clearing the band. It is essential that the programme control is embedded into the current DSO model, having been given a clear set of objectives and funded adequately. Any other option such as a separate entity would only lead to competition for scarce resource and friction due to conflicting of goals.

Question 6: Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and 62? Are there any costs that do not appear to have been accounted for in any of these categories?:

We believe it may be necessary to budget for a small scale help scheme that will run post DSO. Such that any viewers that are adversely affected by the 800 Mhz clearance programme after DSO will have recourse to assistance and even hardware upgrades such as aerial replacement, or being moved to satellite if proven necessary. There may be cases of viewers that had reception after DSO and then lost it after 800Mhz clearance changes. Such instances may be rare but will almost certainly happen. So a fund should be available to draw on to rectify any such issues in such circumstances.

Question 7: Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?:

As some of the engineering works may only be able to be finally completed post DSO and their impact may only become apparent later, we believe the cost profile should be extended into late 2013/early 2014 to resolve any issues that may still require further works and attention.

Question 8: Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?:

N/A

Question 9: Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?:

Yes we feel this is a thorough technical analysis of the situation.

Question 10: Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?:

N/A

Question 11: Do you agree that channel 38 is the best alternative to channel 69 for PMSE?:

Yes, based on the current analysis we would agree with this conclusion.

Question 12: Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?:

Yes this is an acceptable option and would allow PMSE users to have access to spectrum that is essential to their business.

Question 13: Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months? notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?:

Yes we would agree.

Question 14: Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?:

Yes.

Question 15: Do you agree that three years is long enough for PMSE to move from channel 69?:

We do not have enough knowledge of the supply chain for such equipment to comment on whether enough resource is available to manufacture/replace or modify such quantities of radio microphones in a three year period.

Question 16: Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?:

N/A