

Additional comments:

This response relates to the clearing of PMSE from Ch.69.

The case for the clearing in principle is well made, but protection must be put in place to protect the many small businesses, Charities, amateur musical theatre companies and educational establishments. By their very nature these users will be least able to afford the switch over costs and will therefore be unfairly and adversely effected by the changes.

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?:

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.:

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?:

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?:

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

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?:

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?:

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?:

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

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

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

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. It is essential that the cost of existing licence renewals are not increased beyond present levels.

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?:

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?:

No. The asset life of PMSE equipment for LIGHT users is significantly more than 10 years. 20 years is more equitable for these users as indicated by other respondees. Alternatively, FULL replacement should be made available to Small Businesses (say <£20k turnover pa), Registered Charities, Schools and Colleges and Religious organisations. Replacement costs at current prices for a typical 8 Mic system is £6k and is manifestly unmanageable for such light users.

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

No. Suppliers have no plans yet in place to develop new equipment (nor will they have until the final decision has been made). Early indications from (eg.) Sennheiser is that modification will NOT be economically viable - replacement with new equipment will be the only option. If the switch over is less than five years, the short term high demand for new equipment will encourage manufacturers to charge premium prices rather than achieve lower priced, high turnover products, which is what is desirable.

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?:

No. Please see responses to Question 14 & 15 above.