

Additional comments:

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?:

In general, yes.

re 5.47 - Currently there are very few digital wireless systems available. They all suffer from inherent latency problems, subjectively they do not sound as good as current analogue units and they are not cheap!

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?:

Only if there is enough contiguous spectrum available around ch.38 to permit co-ordinated use to continue in the same way as it does for ch67-69 currently.

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. The same terms and costs should apply to ch.38 as currently exist for ch.69, subject to my answer to Q11.

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. This access must be maintained until such time as enough new spectrum has been made available to PMSE and the transition has been allowed to take place.

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.

Funding should be available for the full cost of new equipment that is required to replace existing equipment.

Most systems have a life expectancy considerably greater than 10yrs and would only normally be replaced once they have failed. I have no need to replace any of my equipment in the foreseeable future and it is only as a direct result of the DDR that it will need to be replaced.

Considering the clearance of 800MHz band will potentially raise an additional Â£3bn and to "ensure existing licensees do not bear extra costs that must reasonably be incurred..." it is only reasonable that the funding should be for 100% of the replacement cost.

The cut off date proposed in this document is completely unreasonable since this is a consultation only. Currently there is still no option other than to continue to purchase ch.69 equipment because ch.38 is not available for use on a UK wide basis and the equipment is not yet available.

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

Currently there is little equipment available that operates in the proposed band. It is imperative a decision is made to allow manufacturers enough time to bring suitable equipment to the market place.

Full funding must then be made immediately if there is to be any chance of clearing ch.69 by 2012.

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?:

There is an additional impact to equipment owners who currently use the co-ordinated spectrum (eg. ch67-69). An amount of contiguous spectrum needs to be available around ch38 and full funding needs to be available for these users.

Under the current proposals for the "co-ordinated"/interleaved spectrum, it is possible that multiple systems will be needed to cover the same number of operable channels currently provided by a single unit. Funding should also be allowed for this additional equipment.