

*“Working for quality
and diversity in
British broadcasting”*

Founded in 1983 by Jocelyn Hay CBE



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Response from the Voice of the Listener & Viewer to Ofcom's Consultation on

The UK preparations for the World Radiocommunication Conference 2015 (WRC-15)

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INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, non-profit-making membership association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British broadcasting system. VLV is a charitable company limited by guarantee.

For over 30 years VLV has played a unique role in keeping a citizen's eye on major legislative proposals and action taken by regulators and broadcasters, enabling the voice of consumers to be heard, independent of the interests of political parties, industry players and other pressure groups.

We welcome the opportunity to respond to the Ofcom consultation on UK preparations for the forthcoming World Radiocommunication Conference in 2015 (WRC-15); the Ofcom consultation document was issued in June 2014 with a deadline for responses of 19 September 2014. The WRC is an official decision-making forum for the powerful international regulatory body, the International Telecommunication Union. The ITU regulates spectrum allocations in three world regions; Europe is part of Region 1.

1 General approach and issues

1.1. It is clear from the Ofcom document that the WRC conference covers a very wide range of spectrum issues and Digital Terrestrial Television (DTT) is one small part of that range. Our interests are wholly focused on the issue and principle of the universal availability of DTT and of public service broadcasting (PSB), distributed and made available to all citizens free at the point of use. We believe it is vital that PSB services are available in this manner and that they should also be free of the potential editorial interference that might come from non-PSB platform gatekeepers. We therefore limit our response to comments on the implications of proposals for DTT in the UK and in Europe.

1.2. Our main concern is to protect citizens and consumers of broadcasting (radio and television) from spectrum starvation introduced as a consequence of any over-hasty actions by regulatory bodies and governments. We recognise the legitimate interests of other service providers, most particularly in the area of wireless mobile telephone and data transmission. However, we think that broadcasting in the age of the internet continues to be a robust and most importantly cost effective means of delivery. This is true both from the point of view of the broadcasters but also, most importantly for us, from the point of view of citizens and consumers.

- 1.3. It is always risky to predict the consequences of future technological change. However, it seems likely to us that the scenario of a wholly internet-delivered system for radio and TV dissemination, denied adequate use of spectrum, is likely to result in prohibitively expensive broadband and wireless broadband bills for many individuals and families as they seek to maintain the same level of use of broadcasting services as those they currently enjoy.
- 1.4. A 2013 BBC Trust report on distribution costs found that the delivery of programmes by iPlayer (the BBC's internet-based 'catch up' service) was 'six times more expensive' than the live or 'linear' delivery of its broadcast programmes over the airwaves. This refers to the broadcaster's costs only. But there are additional costs to be computed – those met by the receivers of these services paid for in higher monthly broadband bills.
- 1.5. At present iPlayer use by individuals and families is estimated to consume around 15 – 20 per cent of the UK's total internet capacity. But this is in a context where iPlayer viewing - popular though it clearly is - as yet represents only two to three per cent of all BBC viewing (BBC Trust, 2013: 39). With present internet capacity these figures suggests that if the remaining 97 per cent of viewing time (for just one TV channel) were to be delivered via the internet it would swamp the remaining 80 to 85 per cent of current internet capacity; and this is based on an assumption that all internet capacity is used for the TV programmes of one channel with other popular internet usage – map information, train timetables, business services, currency values – not getting a look in (BBC Trust, 2013: 39).
- 1.6. Such a scenario appears either comic or tragic. But, of course, server and reception capacity will increase – we just don't know by how much and what this will cost. What appears not yet to have been researched, in however hypothetical a way, is the cost to households of a wholly internet-based TV system. On current projections such a system looks likely to overwhelm the existing broadband infrastructure, putting current 'unlimited broadband' packages under severe pressure.
- 1.7. In respect of the duty to innovate so that limited amounts of spectrum may be more intensively used, we think that a new obligation should now be placed on mobile phone and data providers to ensure that their ongoing research and innovation delivers more cost-effective use of spectrum. This is both necessary and desirable as a way of matching the 'digital dividend' already delivered by the broadcasters (and TV users) when they carried the considerable costs of switching over from analogue to digital services.
- 1.8. Given the capacity issues outlined above it is also vital that the mobile broadband providers exhaust ALL other bands available to them before settling on any demand for more of the Ultra High Frequency (UHF) spectrum also suitable for broadcasters.

1.9. We are aware that the development of the 4G mobile services and of the related 'big data' society enables a variety of new businesses and business models to emerge, although the leisure use of many of the new wireless services may have less impact on economic development than has been suggested. GSMA, the trade body for mobile operators worldwide noted that 'In 2011 a 4G connection generated 2.4GB per month ... 28 times more traffic than a non 4G connection' and this suggests that the new services are as profitable as they are mold-breaking.

1.10. However, as politicians and publics undertake a wider audit of change it may be prudent to note some observations from a European Internet Foundation report of 2014. The EIF note that:

...the 'old' electronic media, notably television and radio, reach mass audiences with the same information and content, arguably creating an 'informational commons' and thus arguably fostering informed, participative citizenship.

By contrast, in the case of internet provision:

...Individually customised access to and use of information and communications could undermine the societal function and effect.

The EIF publication goes on to note an important political consequence of this state of affairs:

...Serious political debate has yet to begin on the future relevance of communication that that serves basic public interest objectives – and more specifically on the future place and character of public service media in the internet-based digital world of 2025.(p. 26)

1.11 VLV strongly believes that none of the costs associated with any spectrum change should be borne by DTT users.

2. General Comments on Ofcom's Questions

2.1. In the light of our particular expertise and concerns we limit our response to a small number of the 44 questions posed by Ofcom. Most of the Agenda items for WRC15 are detailed and technical and to do with a range of services in addition to broadcasting. These fall outside the scope of our expertise. For details of the WRC 15 Agenda see pp. 59-61 of the Ofcom consultation document.

2.2. We do not agree that broadcasters should be required to vacate the 700 MHz band, releasing this space for mobile service providers. But we support Ofcom's proposal to make sure that any interference at the band boundary (where the top of the 600 band is adjacent to the bottom of 700 band) is managed correctly. See Question 11 .

2.3. We strongly support Ofcom's suggestion in Question 12 that the 500 and 600 MHz bands are NOT allocated as Co Primary as between broadcasting and the terrestrial mobiles. This would undermine the needs of broadcasters not only in

the 700 band but also in the two lower bands, the 500s and the 600s that are suitable for them. To allow such a re-designation and re-purposing at this stage would place unacceptable pressure on broadcasters and their audiences. Indeed a re-purposing of the 500 and 600 MHz bands at this stage would call into question the long-term viability of DTT. However, we emphasise that at present in the UK and in Europe senior policy makers appear to be making only temporary ‘life boat’ provision for DTT without long-term guarantees. Most of the people – citizens and consumers – who make use of free-to-air Digital Terrestrial Television on a daily basis remain unaware of this radical re-prioritisation of spectrum use.

3. Response to Ofcom’s Consultation questions

Question 1: Do you have any comments on the mechanism for UK preparation for WRC-15 and the role of Ofcom in this process?

VLV welcomes this consultation as a means of eliciting expressions of interest across a very wide range of spectrum applications. In view of the changes in spectrum allocations in recent years and the rapid and increasing demands for spectrum for new services and technologies there is much scope for damaging conflict. WRC15 must aim to deliver efficient and equitable use of resources across nations and the ITU world regions.

A mechanism that allows UK interests to be identified and pursued is valuable as is Ofcom’s role in co-ordinating responses and subsequent actions at WRC15.

Question 2: Do you agree with the prioritisation of the agenda items, as shown in Annex 6, and if not why?

Broadly we agree. Our specific interests are noted above and below.

Question 3: Do you agree with Ofcom’s general approach on WRC-15 agenda item 1.1?

Yes. However, we specifically wish to see spectrum allocated to mobile service providers which is not already being used by public services.

Questions 4-10:

No comment.

Question 11: Do you agree that we should oppose a co-primary mobile allocation at WRC-15 for the band 470 – 694 MHz?

Yes. VLV supports this proposal very strongly. The PSB/DTT platform will already be under significant pressure if it loses the 700 MHz band. The PSB/DTT platform must be allowed to continue to thrive and compete effectively and to develop its services in the future, for example with additional and improved HDTV provision. Moreover, the PSB/DTT platform must be supported to enable the development of as yet unknown technologies and services in addition to those already provided, for example for UHDTV. For these various purposes and innovations DTT needs secure spectrum resources. Any further erosion of spectrum

resources by allowing co-primary status with mobiles in the lower bands would seriously diminish the platform's ability to deliver its services.

If, however, the conference wishes to permit White Space use in these bands our objections are not as strong but nevertheless we are resistant to any sharing given that DTT spectrum has been so heavily constricted.

Question 12: Do you agree that the UK should continue to support harmonisation of 694 - 790 MHz for mobile broadband and an out-of-band emission limit for protection of DTT reception in an ITU-R Recommendation, alongside an acknowledgement that 694 MHz should be the lower frequency boundary for the band?

VLV regrets and finds unacceptable the loss of the 700 MHz band which seems likely to be allocated to the terrestrial mobile services at the WRC15 conference. If so, at least as a compensatory gesture, all possible measures should be implemented to prevent excessive interference to DTT services, both from out of band emissions generally and particularly at the band boundary in the area near 694 MHz. We would correspondingly accept similar measures that affect DTT emissions especially near the boundary.

Question 13-39 and 43, 44:

No comment.

Question 42: Do you have any comments regarding UK positions for future WRC agenda items?

Any proposals to further restrict PSB/DTT spectrum allocations in any way must, in our view, be robustly opposed, whether they are technical or procedural.

Sources

BBC Trust (2013) *The BBC's distribution arrangements for its UK public services*. A report by Mediatique presented to the BBC Trust Finance Committee, November 2013. Subsequently presented to Parliament in February 2014. At URL: http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/review_report_research/vfm/distribution.pdf.

European Internet Foundation (2014) *The Digital World in 2030*. At URL: www.eifonline.org/digitalworld2030

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19 September 2014

BASIC DETAILS

Consultation title The UK preparations for the
World Radiocommunication Conference 2015 (WRC-15)

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Representing (self or organisation/s): Voice of the Listener & Viewer

Address (if not received by email):

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Please tick below what part of your response you consider is confidential, giving your reasons why

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Name Dinah Garrett, Trustee

Signed (if hard copy)

Trustee, Voice of the Listener & Viewer 19 September 2014