

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



**The Old Rectory Business Centre
Springhead Road, Northfleet
Kent, DA11 8HN**

Tel: 01474 338716 email: info@vlv.org.uk
Fax: 01474 325440 web: www.vlv.org.uk

**Response of the Voice of the Listener and Viewer
to
Ofcom's consultation on
700MHz Clearance
Management of transitional coverage issues**

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Executive Summary

- VLV is anxious to preserve the public value of Public Service Broadcasting (PSB) and robustly to protect its place in the Communications market. We value in particular its free availability to consumers through the medium of Digital Terrestrial Television (DTT) which depends upon adequate amounts of Electromagnetic Spectrum that are crucial to its future evolution. We are concerned at the continued erosion of DTT spectrum resources.
- We have concerns about the ability of the remanent spectrum to absorb all current services completely with no loss of quality of service and coverage and no erosion of technical standards eg interference levels used in planning models. We also note that this reduced spectrum will be subject to sharing in the future thus placing further pressure on it.
- Stakeholders in PSB include consumers who hitherto have had little direct say in the recent changes to broadcasting infrastructure which has led to costs and disruption. VLV expects that there will be further cost and disruption for consumers as a result of any 700 MHz band clearance. VLV also expects that such costs are soundly justified and that they are minimised.
- It is to be expected that during the engineering work there will be some disruptions to services; these should be minimised. Furthermore it would be of great value to consumers to be kept fully informed of work in their respective regions so that confusion is minimised especially for consumers with special needs.
- It is also imperative that there is a visible and responsible body to oversee the project that is readily available to consumers and is empowered to resolve issues as they arise.

Information about VLV

- 1.1 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 but also takes note of developments in Europe and the wider world. VLV is a charitable company limited by guarantee.
- 1.2 For over 30 years VLV has played a unique role within Britain in keeping a citizen's eye on major legislative proposals and action taken by British regulators and broadcasters, enabling the voice of consumers to be heard, independent of the

interests of political parties, industry players and other pressure groups. VLV also has an interest and participation in European groups concerned with Public Service Broadcasting.

General Comments:

- 2.1 The VLV welcomes the opportunity to respond to the consultation on the arrangements proposed for the clearance of the 700 MHz spectrum band. VLV has responded to previous consultations concerned with the future use of both the 800 and 700 bands.
- 2.2 During the planning of the Digital Switchover project (DSO) it was considered that the 700 MHz band (694-790 MHz) would be necessary to support Digital Terrestrial Television (DTT). However it has now been decided that this band will be recovered and allocated to mobile communications, only a few years after DSO was completed. The decision is now a *fait accompli* and will be ratified more widely in Europe at the forthcoming World Radio Conference (WRC) in November 2015. VLV has expressed its regret at this decision in previous consultation responses.
- 2.3 As a result of DSO the television service has already been able to return the 790-862 MHz band ("800") for use by Mobile Telephony (MT) operators using 4G technology based on International Multimedia Telecommunications (IMT) standards eg Long Term Evolution (LTE). This substantial band of 72 MHz, over 18 per cent of the original 392 MHz allocated to broadcasters, is already being exploited by British MT operators. Now a further 12 channels, comprising 96 MHz, is being recovered.
- 2.4 However we also note that the hitherto little used 600 MHz band will be made available to absorb some of the displaced services currently in the 700 MHz band. Whilst this is welcomed it does potentially disrupt the High Definition and other services accommodated there. We propose that these services and their future evolution using the newer technical standards of MPEG4/DVB-T2 shall not be compromised by this change and the constriction of spectrum resources.
- 2.5 We are aware that the HD services are transmitted under limited licences whose earliest release is the end of 2018. We are also aware that the latest date for completion of the clearance is 2022 (presumed the end of that year) when mobile communications services are expected to begin. This leaves 4 years for the project to be completed; some assurance by OfCom and other players that this is practical and feasible would be of value to all stakeholders and to consumers in particular.
- 2.6 Our deepest concerns centre on the ability of the remanent spectrum to absorb all current services completely with no loss of quality of service and coverage and no erosion of technical standards eg interference levels used in planning models. We would appreciate a timely statement from Ofcom that this is indeed technically possible before any irrevocable steps are taken. We note that Clause 2.5 of the revised code goes some way towards providing some assurance; however we also note Clause 2.6 and the opening sentence of Clause 4.1 that imply some doubt.

- 2.7 Stakeholders in PSB include consumers who hitherto have had little direct involvement in the planning of recent changes to broadcasting infrastructure which has led to costs and disruption. We are gratified to note in Clause 1.7 of the consultation that consumer interests are considered important and therefore VLV proposes that any further cost disruption for consumers is soundly justified and that it is minimised.
- 2.8 We also note that in Clause 2.8 that the changes required are not trivial and so the risk to consumers is potentially significant. So we also expect a thorough information and support programme to provide consumers with all the information required to understand the changes and to take the necessary steps to adapt to them.
- 2.9 We note in Section 3 the summary of the changes in the revised Code; in particular the identification of categories of consumer that have common interests. The editorial revisions to the Code are appropriate where they are obsolete and have no further relevance.

Comments on the Revised Code:

- 3.1 The consultation requests response to the Question:

Do you have any comments on Ofcom's proposed revisions to the Code of Practice on Changes to Existing Transmission and Reception Arrangements?

- 3.2 We welcome the revised Code document for its coverage and analysis of the many issues involved in this complex project. In particular we welcome the clarification of Sections 3, 4, 5 and 6 that describe practical matters of direct interest to consumers.
- 3.3 We note that the changes involve the activities outlined in Section 3.
- 3.4 We note with special interest the content of Section 4 and would re-iterate our concerns on coverage as stated above in Clauses 2.3 and 2.4.
- 3.5 We note the content of Sections 5 to 8. It is to be expected that during the engineering work there will be some disruptions to services; VLV proposes that these should be minimised. In addition, it would be of great value if consumers were kept fully informed of work in their respective regions so that confusion is minimised especially for consumers with special needs. It is also imperative that there is a visible and responsible body to oversee the project that is readily available to consumers and is empowered to resolve issues as they arise.