Title:

Mr

Forename:

J. P.

Surname:

Gilliver

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

None

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

("1.9 Ofcom considers that this is not a matter which involves any fundamental change in policy" - I consider the removal of the 700 MHz band to be a major change in policy, which has been done with far too little consultation with the majority of users, by which I mean - mostly - the _receivers_ of DTT signals, as opposed to the transmitters.)
\\
2.6 "The basis on which we made the 600MHz band available was to support the interim use of this spectrum for DTT multiplexes using the DVB-T2/MPEG 4 technology to encourage its uptake by consumers." There is a strong _implication_ in this statement that services for consumers who have _not_ "uptaken" this technology will be endangered.
\\
I was going to say that I appreciate that this consultation is not about the decision to close ("release") the 700 MHz band, that being a "done deal", but only about proposed revisions to guidelines; however, the presence of section A5.4 (and to some extent A5.7 and A5.11),

which seem(s) to be attempting to justify that decision (which I would not have expected to be present if only guidelines revision was in question), implies that such justification is still felt to be necessary, reinforcing my points above.

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

The main proposed revisions, as summarised in section 3.4, mostly seem sensible: removal of now-redundant references to analogue services and switchover, certainly.
\\
The revision described in section 3.4.7 - the replacement of an obligation by something more streamlined, but there is always the suspicion that it may be less onerous - could do with greater clarification.

(For future reference: any revision to an existing document might be better discussed by just publishing the revised document in "show changes" mode [that is a Microsoft Word concept, but I am sure other word processors have a similar concept/feature]; this would allow participants to see exactly what changes were being proposed, and there is the facility to add justifying comments.)