

Representing:

Organisation

Organisation (if applicable):

MG ALBA

What additional details do you want to keep confidential?:

Keep name confidential

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

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

MG ALBA wish to make the following representation to Ofcom with regard to the proposed 700MHz clearance.

1. MG ALBA would like to seek assurance that a prompt professional response is provided to those affected to ensure that their viewing enjoyment is subject to the absolute minimum of disruption with replacement equipment and / or retuning being carried out in the shortest time possible.
2. MG ALBA wish to seek assurance that there will be no prolonged loss of service to BBC ALBA viewers.
3. Due to the geographical nature of the BBC ALBA DTT catchment area MG ALBA wish to seek assurance that the spectrum change will not have an adverse effect on the existing signal penetration.
4. MG ALBA wish to seek assurance that the replacement spectrum space provided will have sufficient capacity to allow not only BBC ALBA but all DTT services delivered in the BBC ALBA catchment area to, as and when required, implement HD channels and provide additional services without compromise to picture quality.

Question 1: Do you agree with our assessment of the number of viewers that will need to retune?:

Yes

Question 2: Do you any comments on how viewers will find the retuning process and whether there are particular groups of viewers which will require greater consideration/assistance with the process? What help might they need?:

We feel that elderly and vulnerable viewers will find the retuning process difficult and confusing. They will require a technician to visit their homes to carry out the retuning.

Question 3: Do you have any information to suggest that our estimate for the number of households that will need to replace their aerials should be different?:

We have no information regarding the estimate for the number of households which will require a new aerial

Question 4: Do you have any information relevant to our assessment of the average cost of an aerial replacement?:

The cost of replacement stated seems representative

Question 5: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial replacement?:

The majority of viewers who have DTT as the primary means of receiving a TV signal we feel would struggle with the cost, as would the elderly and those on low income

Question 6: Do you have any information to suggest that our estimate of the number of viewers that may need to repoint their aerials should be different?:

We have no relevant data.

Question 7: Do you have any information relevant to our estimate of the cost of aerial repoints or platform changes?:

The cost of stated seems representative

Question 8: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial repoint or platform change? :

As Question 5

Question 9: Are there any other matters the viewer support scheme should cover?:

The viewer support scheme should cover any costs to the viewer associated with the 700MHz clearance

Question 10: Are there any other elements a viewer information campaign would need to include? Do you have any comments on or further evidence to inform the above estimates of the cost of providing information and advice to viewers? Please provide supporting evidence for any adjustments that you think may be relevant.:

A website is of no use to viewers who are not online or confident in the use of the internet. A television advertising campaign would be the most effective means of reaching those viewers.

Question 11: Do you have any comments on information which is relevant to our assessment of the potential costs of administering a help scheme?:

No

Question 12: Do you have any evidence to further inform our assessment of the likelihood of viewers that suffer from un-related pre-existing reception problems erroneously making claims against a 700 MHz help scheme?:

No

Question 13: Do you have any additional information to further inform our cost estimates and assumptions of the effectiveness for the different triage methods? Are there any other triage methods which should be considered? Please provide supporting evidence for any adjustments you think may be relevant to our current estimates. :

No

Question 14: Have there been any developments since 2014 which would affect our estimate of the amount of equipment that PMSE users will need to replace as a result of 700 MHz clearance?:

There has been a noticeable increase in the use of wireless equipment as capital costs have fallen.

Question 15: Are you aware of any developments since the 2014 Statement that would affect our cost estimates?:

No

Question 16: Do you have any information or evidence of the likely unit cost of new equipment which operates in the 960-1164 MHz band?:

No

Question 17: Have we correctly identified the main categories of PMSE user that 700 MHz clearance will affect? If not, please provide examples of stakeholders which do not fit broadly into any of the groups mentioned.:

Yes

Question 18: Do you have any comments on our assessment of the proportion of equipment the different users types account for?:

No

Question 19: In addition to any information provided in response to the survey, do you have any other evidence as to how clearance may financially affect each of the different categories of PMSE equipment owner identified above?:

: With regard to the solo freelance operator this change has the possibility to have a negative impact both financially and operationally. The cost of ownership is high for a solo operator and the lifespan of the equipment is longer than with hire companies as it is not subject to the harsh treatment hire equipment is. During production which occurs during the changeover period it may be necessary to have equipment suitable for both frequency ranges. PMSE equipment owners in many cases, will need to purchase replacement equipment before any planned capital expenditure is scheduled.