

## **Nimux Input to the Ofcom document: “Managing the effects of 700 MHz clearance on PMSE and DTT viewers - Summary of progress and call for input”**

Multiplex Broadcasting Services NI Ltd. (Nimux) welcomes the opportunity to input to Ofcom’s information gathering on DTT viewer support during 700 Clearance and the impact on PMSE users arising from the reallocation of the 700MHz band for other services.

Nimux and its stakeholders are committed to the delivery of a successful 700 MHz Clearance programme. The reallocation of this valuable frequency band for other use is Government policy and is in the best interests of all stakeholders. Like our colleagues in the European Broadcasting Union (EBU) we are also, however, acutely aware of the importance of digital terrestrial television as the primary platform for the delivery of public service television and other services on a free-to-air basis to those citizens who do not wish to subscribe to pay service providers.

As you are aware, Nimux was established as a joint venture by RTÉ and TG4 to hold and operate the licence for a small multiplex in Northern Ireland which carries RTÉ and TG4 services. Under the terms of the Belfast (Good Friday) Agreement and the subsequent St. Andrew’s Agreement, these services are made as widely available as possible to viewers in Northern Ireland on a free-to-air basis. In conjunction with overspill from the Republic of Ireland, Nimux signals ensure that RTÉ and TG4 television services are currently available to more than 94% of homes in Northern Ireland. Nimux remains committed to ensuring that viewers in Northern Ireland continue to have RTÉ and TG4 services made widely available on a free-to-air basis. To this end, we are anxious to ensure that viewers currently receiving either overspill and/or Nimux transmissions continue to do so post 700 MHz Clearance.

We are particularly concerned that vulnerable viewers do not lose out as a result of 700 MHz Clearance. It is worth reminding ourselves that in the lead up to DSO, there were some instances of pay platform operators encouraging viewers to switch away from free-to-air, citing uncertainty about the future of terrestrial transmissions. As happened at that time, a well supported Viewer Information programme must be put in place to assist vulnerable and other viewers during the Clearance programme.

From the above and our review of Ofcom’s Request for Input document, in advance of answering the specific consultation questions, we would make the following general points:

1. 800 MHz Clearance was inextricably linked to DSO in viewers’ minds as both occurred simultaneously. At the time of DSO, DTT moved from a situation where it was secondary to analogue in terms of overall coverage. Most viewers were unaware that 800 MHz Clearance was simultaneously taking place alongside DSO and effectively have no previous experience of dealing with the removal of a frequency band and the consequent changes arising from this. The viewer information programme for DSO/800 MHz Clearance was comprehensive and worked well for all viewers, making a smooth and seamless transition from analogue to DTT. From the viewer’s perspective, the primary focus of the Programme was DSO. On this occasion, since 700 Clearance is not closely

coupled to another major event, it would not be prudent to assume that it will remain “under the radar” to the same extent as 800 MHz Clearance.

2. The timing of 700 Clearance in the Republic of Ireland will more than likely coincide with that in Northern Ireland so that the 700 MHz band can be made available for non-broadcast purposes in both jurisdictions. This suggests that a cohesive approach to viewer information should be adopted in both jurisdictions as was the case so successfully during DSO/800 MHz Clearance.
3. Nimux is unique as it is part of a cohesive strategy that ensures a mixture of indigenous transmissions in Northern Ireland and overspill from the Republic of Ireland. Depending on location, viewers receive either Nimux or overspill. 700 MHz Clearance will inevitably deprive some viewers who currently receive overspill signals of that reception as they will be longer able to receive signals from the transmission site they currently avail of. Similarly, some viewers in fringe areas currently receiving Nimux may no longer receive a signal from the transmission site they use at present. Arqiva has found that antenna patterns change with different frequencies having tested this hypothesis at Black Mountain. Viewer support, clear, advance and reassuring messaging and communication will certainly be required in these circumstances.
4. Nimux is of the view that there should be consistent messaging between Northern Ireland and the Republic of Ireland in the lead up to Clearance in NI and ROI. To achieve a smooth transition to the post Clearance world, a well-funded information campaign is required for all UK citizens and a support scheme to help those who need it.

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

Ofcom has made a conservative assessment of the number of homes requiring a retune. This is, in our view, a prudent approach.

***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?***

For most viewers, the retune process should be relatively straightforward. The key issue is that clear, precise and advance information must be provided as to when to retune. If some viewers retune early (before the Clearance event has taken place), then they will lose signal when Clearance actually happens. Vulnerable viewers, such as older citizens or those with a learning disability, will require guidance and assistance to help them make the transition to the post Clearance world. The vulnerable may need help from a neighbour or perhaps a local “Clearance Champion” to do the retune for them. The local retailer is unlikely to be able to help as most TV sets are sold on a take –it-away basis and the customer has to self install.

Viewers in Northern Ireland are likely to need a greater level of assistance as the majority of DTT viewers receive both Freeview and SAORVIEW overspill from ROI. Changes in coverage patterns will have a significant impact, particularly in fringe reception areas. Again, clear information presented in a timely fashion is vital and vulnerable viewers will require outside assistance as detailed above.

***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?***

Nimux does not have any statistics on the quality and type of existing antenna installations in Northern Ireland. We would, however, point out that some viewers, in very marginal reception areas, receiving ROI channels via overspill already have mast head amplifiers as part of the antenna installation. Filters may have been installed at some locations during 800 MHz Clearance and it is possible that these may have to be changed to filter the 700MHz band post Clearance. Others do not have filters at present but these may be required post Clearance.

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

We do not have statistics on aerial replacement costs.

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

We would suggest that current economic circumstances have not changed significantly from those pertaining in 2010-2012 during DSO/800 Clearance. This would suggest that the proportion of viewers struggling to bear the cost of replacing their antennas would be broadly similar to that during DSO/800 MHz Clearance. It could be argued, however, that viewers who are under financial pressure may have postponed replacing their antennas and these might now need to be replaced when frequency changes take place.

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

Viewers in outer coverage areas currently served by a particular transmission site may have to repaint their antennas when that site changes frequency. As you are aware, Arqiva has modelled this and suggests that changes in predicted coverage will arise at the outer edges of certain coverage areas.

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

Repainting an antenna should, for the most part, require a aerial installer to go on a roof and perform a simple task. This should only involve a call-out charge. Some installations to be repainted may require renewal. This could arise, for example, in circumstances where there is evidence of rust on the pole or brackets and these cannot be moved without damage to the installation. We have not conducted a survey of roof top installations so we are unable to provide any statistics.

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

We would suggest that current economic circumstances have not changed significantly from those pertaining in 2010-2012 during DSO/800 MHz Clearance. This would suggest that the proportion of viewers struggling to bear the cost of repainting their antennas would be broadly similar to that during DSO/800 Mhz Clearance.

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

In Northern Ireland, it is important that view messaging should be consistent with that of the Republic of Ireland. As Nimux is a hybrid of DTT transmissions in Northern Ireland and the use of overspill from the Republic of Ireland, it is important that messaging from both Freeview and Saorview is consistent so that free-to-air viewers are given clear, consistent messages and able them to continue to enjoy UK and ROI television services without feeling compelled to migrate to pay TV platforms.

***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.***

The lesson from DSO/800 Clearance is that a well organised, advance, clear and re-assuring information campaign is essential to a maintaining viewer confidence in the free-to-air platform. If this lesson is ignored and a well resourced information campaign is not put in place, viewers will feel vulnerable and an information vacuum will be created. This vacuum will then be filled by alternative offerings, particularly aimed at the vulnerable, to encourage them to switch to pay platforms and away from free-to-air television. We have not costed an information campaign, but are of the view that something of the scale of DSO/800 Clearance would be a good analogue.

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

We have not costed the implementation of a help scheme and are, therefore, unable to comment further.

***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?***

We have not conducted a study of viewer behaviour relating to reception problems and are, therefore, unable to comment.

***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.***

For the most part, reception problems can affect a number of homes in a particular area. It would be unusual that a single house in a street suffers interference while the remainder receive perfect signals. A starting point for reception triage would be to conduct telephone interviews with competent installers to determine existing problem areas in each Clearance region. Competent local aerial installers have extensive knowledge of existing reception problems. A number, but not all, of these are members of the Confederation of Aerial Industries. We understand that Digital UK may also have interference data collected via its Call Centre. To triage reception problems:

1. determine whether the address is in a likely problem area.
2. On foot of a complaint, Interview the viewer by telephone to determine if the reception problem has been in existence for some time and/or shared by neighbours
3. If the problem has been ongoing for some time then it is not attributable to 700 Clearance
4. If the problem has not existed previously and has suddenly appeared since 700 Clearance, that the problem is attributable to Clearance.

***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?***

Nimux is solely a multiplex licensee and does not have any PMSE equipment or conducted any research into this area.

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

Nimux is solely a multiplex licensee and does not have any PMSE equipment nor has it conducted any research into this area.

***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?***

Nimux is solely a multiplex licensee and does not have any PMSE equipment nor has it conducted any research into this area.

***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.***

Nimux is solely a multiplex licensee and does not have any PMSE equipment nor has it conducted any research into this area.

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

Nimux is solely a multiplex licensee and does not have any PMSE equipment nor has it conducted any research into this area.

***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?***

Nimux is solely a multiplex licensee and does not have any PMSE equipment nor has it conducted any research into this area.