Digital TV Group (DTG) response:

Ofcom consultation on 'Securing long term benefits for scarce spectrum resources – a strategy for UHF bands IV and V'

07 June 2012

Executive Summary

The Digital TV Group (DTG) recognises that there will be increasing demands on UHF spectrum in the near future, and that it is particularly important that this spectrum is used effectively and efficiently for the maximum benefit to UK consumers and industry.

The DTG is keen to assist with the introduction of emerging technologies in order to facilitate greater efficiency; while also recognising that digital terrestrial television (DTT) is relied upon by many consumers who have high expectations of its continued development and future integrity.

The deployment of new technologies that make use of spectrum in UHF bands IV and V must be carefully planned and managed to ensure coexistence with DTT if the UK. It is important that neither the quality of existing DTT services or the emerging technologies making use of this spectrum are compromised if the UK is to benefit fully from new and efficient uses of spectrum whilst maintaining its global reputation for innovation.

Response

1. The DTG's response relates principally to questions 15 to18 on the possible clearance of digital terrestrial television (DTT) from channels 49-60 and its reintroduction to channels 31-37, and to questions 19 and 20 on the short term use of channels 31-37.
2. The DTG agrees with Ofcom and the Government that UHF spectrum is valuable and should be used efficiently and effectively to secure benefits for UK consumers and for the UK industry. The DTG has previously worked closely with industry, Ofcom, and Government to introduce new technologies. The DTG is well placed to assist again with improvements to the way UHF spectrum is used, benefiting both industry and consumers wishing to take advantage of new services and those who would like to maintain high quality TV reception.
3. In the event of a decision that DTT should move out of the 700MHz band (UHF channels 49-60) and into the 600MHz spectrum (channels 31-37), Ofcom and Government should recognise the significant nature of this change and the impact this would have on the businesses involved in DTT, as well as on viewers. The change should be organised and

managed to minimise effects on viewers and businesses, and to maximise opportunities to develop both the DTT platform and new spectrum uses for the benefit of stakeholders and viewers.

4. The revised frequency plan and resultant transmission changes for the DTT network would require careful planning and management. It represents a change for businesses and viewers that could potentially be even more challenging than digital switchover. Switchover has been successful because of the comprehensive research, planning, and support for viewers (including support for vulnerable viewers) which was designed into that programme. Building upon the UK's experience of switchover, the following elements should be taken into account:

    a. Clear engagement and agreement with industry (including broadcasters, manufacturers, supply chain, and network operators) on the process needed to implement the change, including detailed timescales.

    b. Early certainty over dates and processes, including processes for financial compensation, giving businesses and consumers time to plan.

    c. Prior to a decision, there should be analysis of the impact of the change and identification of issues that may require preparatory work including analysis, research, and pilot projects.

    d. Analysis of the needs of viewers that would benefit from additional support, including those who are socially isolated or those who have low confidence with technology.

    e. The planning should build in enough time for spectrum planning and coordination.

    f. There should be a further formal consultation on detailed proposals.

5. Ofcom should allow enough time for industry to make a decision on upgrades that could be made to the platform in a coordinated way alongside the frequency changes. In the past, major upgrades, such as that to DVB-T2 and MPEG-4, have only been introduced when the improvement was worthwhile e.g. delivering a significant improvement in efficiency. It is quite possible, on the timescale of any frequency changes, that worthwhile improvements over the current DVB-T2 and/or MPEG-4 standards will be available. The decision would be best taken by the industry and Ofcom and Government have a significant role to play in providing the right regulatory conditions and processes. A good example of this kind of managed platform development was the introduction of Freeview HD. In this case broadcasters, manufacturers, standards bodies including the DTG and the DVB, network services companies and the supply chain all came together with Ofcom and Government to create a well defined plan.

6. In contemplating a move of DTT frequencies it would seem appropriate for Ofcom to make and publish an assessment of the feasibility, including comparative benefits and costs, of comprehensive re-planning of the TV spectrum with neighbouring countries (that is, to re-plan without using the current assignments and allotments as a starting position). Ofcom and Government should conduct its international spectrum negotiations so as to keep open the possibility of a complete re-plan. We welcome the study by Arqiva ("700 MHz Clearance Planning Options Based on Existing Usage", Version 1.1 23 March 2012) which was made available on the Ofcom web page for this consultation.

7. In considering a move of DTT frequencies, Ofcom and Government should consider which, if any, of Digital UK's current functions should be maintained in the interim period to ensure continuity. Of particular concern to the industry is that competent phone and online help for viewers should be readily available both before and throughout the process. The burden of providing such help should not fall unfairly on manufacturers, broadcasters and retailers. It would seem prudent to preserve and build upon the expertise in viewer support developed by Digital UK.

8. In preparing for a move of DTT frequencies, Ofcom should take account of the existing receiver population, the expectation by viewers that receivers on sale now will have a reasonable useful life, and the time taken for new products to be brought to market. In the event that newer standards, such as DVB-T2 or newer developments, will be introduced as part of the frequency move, consideration should be given as to how uptake of receivers incorporating these new standards might be encouraged in advance. Ofcom and Government should also take account of the likely requirement for replacement of domestic aerials arising from transmission frequency changes.

9. On the short term use of channels 31-37, some DTG members observe that it would be sensible to reserve these channels and allow: (i) pilot use of new technologies that may be necessary for any change of frequency allocation and/or (ii) early movement of DTT services into these channels as part of a managed change. However some members can see significant benefits for UK plc if the 600MHz is available for unlicensed TV White Space uses until such time as required for possible DTT use. It would seem prudent to use the 600MHz spectrum in the short term without prejudicing the move of DTT from the 700MHz band at some point in the future.

10. The DTG is working in support of the introduction of a regime for the use of TV White Spaces in the UHF spectrum in a way that is consistent with continued good coverage of DTT. The DTG is a member of the Cambridge White Spaces Consortium, which has also responded to this consultation.

ANNEX 1

About the Digital TV Group (DTG)

The Digital TV Group (DTG) is the focal point of the UK's digital TV industry. The Group, a not-for-profit membership organisation, brings the industry together to enable the successful delivery and evolution of digital TV and associated technologies.

The DTG publishes and maintains the technical specification for Freeview, Freeview HD and Connected TV (the D-Book) and runs the digital television industry's ISO accredited test centre: DTG Testing.

The DTG has published and maintained the D-Book for over a decade and the specification is updated annually to keep up with the pace of development in UK DTT. The D-Book is compiled by DTG working groups comprised of the DTG's membership and staff who continually update and peer-review the specification.

This document has been written using feedback from the DTG's membership but does not necessarily represent the views of all DTG members.

The first edition of the D-Book was written in 1996 when the current UK standard for terrestrial broadcasting (DVB-T) was new and untried. Early editions of the D-Book enabled the publication of the European digital TV specification: the E-Book.

In March 2009, the DTG published the 6th edition of the D-Book—enabling the launch of an initial three free-to-air HD channels on Freeview by late 2009, as well as the introduction of a broadband return path which has the potential to be used for streaming on-demand video content such as BBC iPlayer, ITV Player and 4oD. It also introduced DVB-T2, the new modulation scheme that is being used in the UK to deliver these services.

In March 2011 the DTG published D-Book 7, the detailed interoperability specification for digital terrestrial television with extended Connected TV functionality. D-Book 7 provides an industry-agreed baseline specification for Connected TV products and services that Sky, Virgin Media, YouView and others can build on for trademark requirements to support their services.

The DTG's test centre: DTG Testing tests digital TV products applying for the Digital Switchover Certification Mark (the 'digital tick'), Freeview, Freeview + and Freeview HD logos against the D-Book standard. Any manufacturer wishing to use the Freeview HD logo on a product must pass the required DTG Testing Freeview HD tests.

Since the DTG was established over a decade ago, the Group has worked closely with our members to adapt international standards such as DVB-T and DVB-T2 to create an interoperable UK digital TV platform that consumers can rely on.

The DTG currently has liaisons with international standardisation bodies including DECE (Ultraviolet), ETSI, HbbTV, and the Open IPTV Forum (OIPF). The DTG has incorporated parts of these standards into D-Book 7 and adapted them to make them work for the UK market. Extensions have now been fed back to the standardisation bodies to enable the next generation of standards across Europe.

The DTG continues to allow Digital Europe to use areas of D-Book copyright under licence to encourage international harmonisation.

Following the publication of D-Book 7, the Group is now finalising the test and conformance regime for Connected TV products and services and supporting the development of next generation technologies such as LTE, TV white spaces and home networking.