

Title:

Mr

Forename:

Platt

Surname:

Matthew

Representing:

Self

Organisation (if applicable):

Email:

matthewjamesplatt@gmail.com

What do you want Ofcom to keep confidential?:

Keep nothing 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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

The reallocation of this band would fundamentally change the use of this spectrum. The Digital Dividend work is based on the assumption that current operators making use of it are able to provide the same (or an improving) level of services in a greatly reduced frequency range, of which I have my doubts.

Additionally, whilst terrestrial broadcasting services are planned to be 'reallocated' (which is

an incredibly costly and time-consuming exercise in itself), other services such as cable TV / cabled internet provision have no such plans and may encounter significant interference, which to date does not appear to have been taken into account when planning the 790MHz band allocation. Work to define the issues and a full impact assessment should take place in the 600MHz before any further decisions are made.

Question 1: Do you have any comments on the application of the protection clause to all new licences for the 600 MHz band and geographic interleaved spectrum?:

The protection clause must be worded strongly enough to deter potential interfering technologies, and to fully compensate any victims (which could include domestic and professional equipment).

Question 2: Do you have any comments on our approach to technical licence conditions for the 600 MHz band and geographic interleaved spectrum?:

Out of band and spurious emissions limits have been defined for use in the current broadcast bands for a number of years. Any reallocation should make use of the existing work to allow reallocated services to continue to function as intended. Work must be conducted to determine the effect any allocations would have on a) cable networks and other users who would not be 'reallocated', and b) users of reallocated services who use existing wideband receiving antennas, amplification and distribution equipment.

Question 3: Do you have any evidence using frequency offsets with DVB-T2 EC signals might have an adverse impact on uses of adjacent interleaved spectrum?:

Question 4 Do you have any evidence mobile services using the 600 MHz band and geographic interleaved spectrum could cause harmful interference to cable television?:

We have been conducting a lengthy test programme over the 25-862MHz band that has repeatedly demonstrated that all customer premises equipment located in close proximity to an in-band transmitter can suffer seriously from interference. Other work, conducted by stakeholders and administrations, demonstrate similar issues.

Any combination of wideband receiving antenna/amplifier/distribution unit can allow ingress which could affect the image channel/LO of domestic terrestrial equipment.

Question 5: Do you have any comments on protecting PMSE in channel 38?:

As stated previously, this should be protected with strict out of band and spurious emissions limits.

Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?:

Concerns centre around end users and the procedure for reporting interference if it is experienced: will they have to pay a fee if equipment must be changed, or if their premises must be attended, and what can they expect to happen when an issue is submitted?

Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?:

Uses are not of significant concern to me; I'm happy for the 'technology neutral' approach to be retained until award. However, any potential incumbent must be considered for its likely impact to existing and adjacent users of the band (i.e. a full interference assessment should be conducted).

Question 8: Are there any distinctive considerations and uses for this spectrum in the nations and regions of the UK?:

Question 9: Do you have any comments on our continued inclusion of channel 36 in the award of the 600 MHz band?:

Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?:

Market-led approaches suit Ofcom and, I believe, the UK well, providing there is a framework from within which the process is run, which includes proper and full assessment of proposals and allocations and licenses with respect to interference to other users of the radio spectrum.

Question 11: What information can you provide on packaging and award design considerations?:

Question 12: When would you like to start operating new services using the 600 MHz band and/or geographic interleaved spectrum?:

It is my firm belief that the level of coordination required to release the 600MHz band from terrestrial broadcasting alone would take a large number of years, and that work to establish solutions for the Cable TV / cabled internet community would also take a significant period of time, not to mention expense.

Finally, the consequences to the end user are not insignificant, especially if new antennas, amplifiers, set top boxes etc are required to take part in this new switchover.