

Comments:

3.5 The five key areas are out of sequence

- Ofcom's first duty is to ensure the delivery of public interest objectives; it's second is to empower citizens and consumers, and only after that and in support of those two objectives does driving forward a market-based approach to spectrum, where appropriate, become relevant.

The importance that Ofcom ascribes to each area is implicit in the order it lists them so the current list of key areas suggests that Ofcom does not take its principal duty, as laid out in section 2.2 and in the bill that set up the organisation, seriously.

3.16 Promoting competition & LLU

- BT appears to have indulged in the deliberate trashing of socially provided broadband networks in rural areas to protect its monopoly. Rural areas are unlikely ever to get fixed broadband from any of cable or telephony company, eg Virgin, so BT can leave them hanging as ever-ripe fruit until it decides to pick them.

Anecdotally, BT is asked when it can provide broadband, it replies with no likely date, local businesses ask the RDA to help with wireless, the RDA agrees and supports the installation of a co-operatively supported wireless network for the valley and BT, upon hearing of this, rushes the introduction here rather than somewhere else less independent to protect its long term profits

- Result: Market approach & corporate profits 1 - 0 Interests of citizens in relation to communications matters

- It is also apparent that the competitive field is not level and that unequal conditions & restrictions applied to BT vs VirginMedia (eg access to discounters for phone services, cost of 0845 nos) VirginMedia's customers should not pay for the protection that Ofcom wants to give the company.

3.20 Mobile market

- Line termination charges in mobile market (ie cost of calling a mobile number) are too high to be justified by cost alone, act as a barrier to new entrants, support the established oligopolies in the market and transfer some of the cost of the mobile network to landline callers.

3.25 DAB

- Poor coverage and shoddy sound even when the signal is received. For us, cricket on R4 long wave at least as good as on R5SX, tunes more quickly and uses less power to process the signal. As a casual observer I notice that the rest of the world has not followed the UK in developing DAB.

3.27 Gaps in mobile coverage

- The market system has failed to provide ubiquitous mobile coverage, even in urban areas; for example even in towns there are blank spots, message drops in handover from one aerial to another and people who have mobile phone coverage at one end of the house and not the other, let alone whole areas that have no coverage; it should be a requirement of the mobile licence that a mobile co covers all country properly - it is generally agreed that France has done this better and that you get better coverage and fewer drops there,

3.30 - barriers to entry to market/ ease of switching

- allowing/ encouraging 'wire' suppliers (ie BT & VirginMedia) to offer additional services such as email ties customers to their ISP more effectively than setting up scheduled payments ties a customer to a bank - changing email address is an effective barrier to changing, so addresses should be transportable when changing ISP. Wire providers should be constrained to focus on hardware connections, which would ensure their attention to providing the best service to as many people as possible - the current arrangement allows providers to make their profit by focusing on a few intensive service consumers instead of doing what Ofcom wants, which is providing connections for all.

5.58 Digital switchover

- digital rollout of terrestrial TV - how do you ensure that the BBC has not used its digital rollout fund to fund or part fund local news website and so undermine local news organisations.

- How do you ensure that information on digital Britain website is correct - speaking personally, the digitaluk website claims my area has digital TV but, as far as I can tell, this whole side of the valley gets its signal from a repeater which is not digital (ie Cop Hill vs Emley Moor), so buying a digibox was a waste of time, and the brand of digibox cannot be upgraded to the new standard, which was introduced almost immediately after the original one - all due to shambolic data management and/or overstatement of achievements in changeover.

Question 1: What are your views on the continued relevance of Ofcom's three-year strategic framework for the proposed work programme in 2009/10?:

Question 2: What are your views on Ofcom's proposed policy work programme and top priority areas for 2009/10?:

Question 3: What are your views on the elements which should be contained within Ofcom's new strategic framework?: