

Response to Consultation Document for the Digital Dividend Review: Band Manager Award by the *Advisory Committee on Older and Disabled people*

Introduction

The *Ofcom Advisory Committee for Older and Disabled people* continues to retain a strong interest in the DDR and Ofcom's approach to managing the precious spectrum which digital switchover will unlock.

We view our responsibility as being to highlight the particular needs of Older and Disabled people and to ensure that they are able to benefit from the DDR in the same way as other – less high profile, or often commercially profitable - groups.

Due to an aging population, these groups are growing in number. It is right and proper that Ofcom should support efforts to ensure the social and digital inclusion of these audiences. The DDR therefore must recognise this and ensure that groups who represent older and disabled people are able to understand the changes you propose and that they are equipped with the skills and knowledge to access spectrum in the new ways you are proposing.

Market Led Approach

As you will know from our previous submission, we do not think that a market led approach to spectrum is always appropriate, and whilst we understand that this is Ofcom's preferred approach, we would like to ensure that the Band Manager(s) have the opportunity to be practical and pragmatic in their administration of spectrum, as well as ensuring an appropriate financial return for this resource.

Therefore, we are pleased to see to read in Section 1.4 that:

“Our objective for the DDR is to maximise the total value to society that using the digital dividend is likely to generate over time. It is not our objective to raise revenue for the Exchequer, nor is this a consideration that we can take into account given our statutory duties.”

However, we feel that the definition of what constitutes “*total value to society*” requires further explanation and a more explicit recognition that this may mean some spectrum users will, on occasion, not necessarily be charged the market rate for the resources they are using. Balancing the need to maximise the monetary value of spectrum with the need to ensure total value to society is a complicated task, and we would welcome more information on how this balance will be achieved.

We are also concerned that your proposals may result in some users being charged to use resources which are currently free of charge. Whilst in some instances, e.g. commercial ventures, this might be appropriate there are others; such as wireless mics being used in Churches or Schools – as well as examples such as loop linked systems used by the hard of hearing - where we feel that this is wholly inappropriate.

As an example, schools often use wireless microphones in the classroom so that a teacher can wear a clip mic set to a frequency which only disabled pupils are able to use or access. This means they are able to hear more effectively what is going on, and this is done in a discreet subtle way which helps to reduce social stigma.

If schools had to pay to use this spectrum, there is a risk that this type of resource and support would be lost. Moreover, it may resort to bodies such as Churches and Schools using older technology to circumvent some of these issues e.g. microphones and sound systems run using large amounts of long cables and cabling. These cables create additional Health & Safety risks which are not a consideration in the same way when wireless technology is used.

PMSE Users

We believe that many of these arguments are equally applicable to your comment in 7.7 that:

“We propose to require applicants for the licence to be awarded to demonstrate the following plans for moving PMSE users to a market-based approach to spectrum access”.

Again some of the Band Managers / licence applicants may be bodies and agencies who do not wish to work in this way e.g. Schools, NHS Trusts etc and therefore we are anxious to ensure that these applicants are not penalised by virtue of the fact that their approach may differ from that of more commercial operators.

Cognitive Devices

This is area of nascent, emerging, technology and one which we feel could be of considerable benefit to Older and Disabled people, especially in terms of medical uses.

In the light of this, we would like Ofcom to give further consideration to how allocation of spectrum will be prioritised and the position that medical appliances have in this hierarchy, this includes medical support

such as telemedicine applications which may be delivered via mobile telephony and wireless broadband as well as Digital TV.