

Name and title under which you would like this response to appear:

Anonymous 15

Representing:

Self

What do you want Ofcom to keep confidential?:

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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

Question 1: To what extent do you consider that DTT, DSat, cable and IPTV are in competition with one another for subscribers of pay TV services ? either at present or in the future?:

Digital television currently has a fairly good balance in terms of pay services - satellite has a pay service, cable TV has a pay service, both as monopolies so any consumer knows what they are getting when they buy into them. As a neutral and smaller platform, Freeview offers a smaller channel selection with no pay services (putting aside for the moment TopUp TV, which frankly shouldn't be there), which is how it should be.

Question 2: To what extent do you consider the Proposal is likely to deliver benefits to the consumer?:

In a nutshell, it doesn't. The service is called FREEview for a reason - the service is free. Adding yet more subscription channels to the basic UK television service adds a layer of confusion, means the basic viewer has less choice on what should be an open & free platform which is already polluted by pay services, and the fact Sky wishes to broadcast MPEG4 on Freeview bandwidth requiring people to replace perfectly good boxes just for their service is frankly bad for the platform, bad for consumer

confidence in DTT, and bad for digital switchover in general. It was bad enough TopUp TV was allowed on the DTT platform, never mind this.

Question 3: To what extent do you consider that there is scope for sustainable competition in pay TV on the DTT platform and, more broadly, across all pay TV platforms?:

There is no scope for pay TV on the DTT platform. There is precious little bandwidth as there is for HD or other services, without Sky removing yet more of it with incompatible-with-existing-equipment streams.

If Sky wish to do subscription content on a lower tier, let them - on Freesat, which has the bandwidth. NOT DTT Freeview.

Question 4: What are likely to be the key aspects of competition between providers of retail pay TV services on the DTT platform? E.g. what is the role of premium sports and movies content?:

See above for reasoning again, but retail pay services should not BE on the Freeview platform. There is too little bandwidth to waste on pay services that could be on Freesat from either Sky or the upcoming BBC/ITV initiative, where there is the space to feasibly do it.

Question 5: Do you consider that if Sky were to become the only provider of pay TV on the DTT platform it would be likely to have a significant detrimental effect on competition in the long term? How might this affect the development of other platforms for the delivery of pay TV services?:

Yes, it would. They already have a monopoly on their own platform, that and their plans to broadcast in MPEG4, breaking the Freeview platform apart into Sky-Freeview and a lower-tier Freeview through their own equipment is a serious threat to the future of free and non-Sky owned DTT.

Question 6: To what extent, if at all, do you consider that the Proposal would be likely to lead to any of the public policy concerns outlined at Section 4?:

Once again, it must be stressed - Sky have their own platform that they have a complete monopoly on in Digital Satellite Television. Adding dominance to DTT to their list increases their power far too much, and will be only harmful in the long run.

Question 7: Specifically, to what extent do you consider that the Proposal would be likely to lead to consumer confusion?:

Extreme customer confusion. Non-Sky DTT boxes will not be able to pick up Sky's signals, Sky will be fracturing the platform, and they should be denied.

Question 8: To what extent do you consider that it is beneficial for consumers to be able to obtain Sky and existing DTT pay TV content without having to purchase separate STBs?:

Extremely non-beneficial! Why should consumers be required to fork over perfectly good money to Sky just so they can break the platform? A framework for encryption already exists on Freeview, and were, heaven forbid, Sky be allowed to launch yet more pay TV on Freeview, they should be forced to stick to the existing standards of the platform, both in encryption AND using MPEG2.

Question 9: Do you consider that the Proposal might lead to any additional public policy concerns:

The proposal's MPEG4 plans as well as adding yet more pay TV to DTT will decrease customer confidence in Freeview prior to the vital stages of Digital Switchover, add yet more weight to Sky's already heavy domination of UK television services,

Question 10: If Sky becoming the only provider of pay TV services on the DTT platform were likely to have a significant detrimental effect on competition, do you consider that it is possible to address this through a set of additional conditions and/or directions? If so, what form should those conditions/directions take?:

Yes, it is - they should not be allowed to do anything they are requesting in this proposal. Sky already have a pay TV platform, adding DTT to it will be bad for competition, bad for consumers, bad for DTT, and only good for Sky shareholders.

Additional comments:

Sky must not be allowed to fracture the DTT platform into a tiered Sky-only service that removes channel bandwidth from channels that actually obey the spirit of the Freeview setup. Ofcom must deny in full this proposal, lest it be shown to be completely under the thumb of Rupert Murdoch.