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

Anonymous 39

Representing:

Self

What do you want Ofcom to keep confidential?:

Keep name/contact details/job title 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

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?:

In my view DTT, DSat ,Cable and IPTV are not all in direct competition at the high end of the martket. The newer HD and interactive services all go to the DSat platform first and this is all down to the lack of bandwidth on the others. Cable being the exception but I personnaly have no idea what is keeping them from being so far behind other than their own business model which says people want cheaper TV and not better TV.

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

This all depends on how Ofcom handles the proposal. With an 85% takeup on freeview already, telling people they need a new box would be impractical. Allowing sky (or any other company) to broadcast services in this bandwidth which people cannot view is wrong in my opinion. MPEG-4 is however the way forward and what is required to provide the consumer massive benefits including HD which would take up a lot of the remaining DTT bandwidth.

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?:

If there is enough bandwidth such that there is no monopoly on it, then this will increase the levels of fair competition. Sky being able of outbid the other companies for limited space is not Sky's fault but rather that of Ofcom for not having the space which is reserved for sale to other companies. Sky sell of bandwidth to other pay TV companies, Virgin do if you are not Sky (petty) and DTT still only has the core channels which people watch. The Pay TV options on DTT are currently appauling and not worth the money which you are asked to pay for them. Introducing Sky Picnic as MPEG-2 would ease this problem but as MPEG-4 does not help the matter.

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?:

It has been a long time since Premium Content has been available on the terestrial platform, and who owns that content is not that important provided that they have a fair chance to provide it to their potential customer base.

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?:

First question: Yes, this would be the wrong thing but as mentioned not neccesserily Sky's fault that they are the only provide which can have space as there is no other space available for others. The question here is really what does the consumer want to have on their DTT platform and what don't they want. e.g. how many people actually watch Sky Three which shows programs which are over 1-2 years old.
Second Question: If they can't get the bandwidth to transmit in then DTT as it is now is banging it's head against a brick wall.

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?:

Digital UK is active now and thus this tells the public that DTT is ready for them, yes and no. In its current form DTT is going the same route as the old analogue system. It is better quality, there are _more_ channels, but expansion to HD... not feasible with the current system. So should Freeview remain review and all top-up srvices move to a new system "Digital2", i think so.
In my option, Digital2 should use DTT to provide TV over frequencies which are different from those of Freeview and have enough bandwidth to allow pay-tv companies to bid fairly on parts of it. A new STB (DVB-T2) would be able to both

recieve Freeview and "Digital2" providing the consumer with HD and PVR services if applicable.

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

It is already confusing enough in that not all boxes come with a card slot thus pay-tv is not available to everyone as it stands anyway. It would be interesting to know what percentage of the 85% DTT users have a pay-tv compatible box. Adding a pay-tv service which these consumers couldn't even recieve would be even worse.

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?:

I think it would be very beneficial. However the bandwidth limitations mean that competition levels are unfair.

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

Other than those already mentioned I cannot think of any here.

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?:

Sky are clearly trying to push the market into DVB-T2 which would allow more bandwidth to be available for more of their own channels or that of others.
If I were Ofcom i would say to sky that they can be one of the providers on a "Digital2" platfrom (seporate from freeview) which uses DVB-T2 in a different area of the spectrum to the current DTT system. They can provide and sell STBs which can handle the new frequencies and MPEG-4/HD etc however they do not own all of the bandwidth which is available and allow other providers to buy parts of the bandwidth which they can transmit to these boxes on. I can see how this would case problems if the STB was not owned outright by the consumer however, but i'm sure Ofcom could sort something out.

Additional comments:

I think it is sad how DTT is already banging its head against a brick wall when most consumers think that it is a direct competitor to DSat and Cable services just because it has the word digital in it. Maybe viewers should be told that DTT is going no whrer fast which is todays age of technology is sad. HD has now been on DSat over a year yet on the DTT platform it will be another 2 years was it? 3 years of lag between platforms is not exactly direct competition.

If Pay-TV is coming to DTT at MPEG-4 do it properly the first time and avoid all of these current problems, nothing like a good bit of investment in upgrading the transmission equipment to handle the new frequencies. Besides an 85% uptake on the current system is a good start.