

Title:

Mr

Forename:

Colin

Surname:

Craig

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

as above

Representing:

Self

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

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?:

They are and will continue to be in competition with each other.

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

Whatever short term gains for the consumer should be balanced by Sky's long term business aims, which is to dominate and monetise Freeview.

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?:

The service is called Freeview. Adding further pay-per-view to the service undermines that basic principle. The aim of Sky is to neutralise or subvert the threat posed by free-to-air services. By adding three pay-per-view channels to Freeview it helps in that and also blocks frequencies that could be used to provide HDTV on the Freeview platform - something that Sky will be desperate to prevent.

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?:

Freeview was set up to provide a digital platform for the terrestrial services. Personally, I think it should be used only for that, with the addition of HDTV services as they become available from terrestrial broadcasters. Already that free-to-air principle has been undermined by Sky etc. It is obvious that pay-per-view operators wish to limit or preferably destroy Freeview as it is anathema to their business model. Establishing increased pay-per-view channels on Freeview is a Trojan horse.

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.

Sky aims to dominate all aspects of the business it is in. That has already led to the removal of most popular sports from terrestrial free-to-air TV. The company has done, and will continue to do, all it can to limit competition to its business model.

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?:

If Sky is allowed to introduce three new pay channels which require new set top boxes, then it is already on its way to controlling the future of Freeview. It will begin to dictate the technical standards and the content. There is an obvious conflict of interest for Sky. The aim of the company's business model is that the public has to pay for its services. Free-to-air TV is a threat to that.

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

If you have to pay for it, it's no longer Freeview.

'AlmostFreeview' or 'NearlyFreeview' doesn't have the same marketing ring to it.

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?:

Separate set top boxes further undermines Freeview, in my view.

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

Sky is part of the Murdoch empire which already dominates the UK media market. In the US we have seen the result of TV media domination by conglomerates, with a concentration on game shows, celebrities, reality-TV etc and a marked aversion to TV journalism holding government up to scrutiny. Murdoch-owned Fox TV has been in the forefront of that. The proposals will ultimately reduce choice and further concentrate power in fewer hands, whatever the short-term gains may be.

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?:

Additional comments: