

**Title:**

Mr

**Forename:**

Bob

**Surname:**

Hargreaves

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

Mr Bob Hargreaves, Chair Genesis Association(Wales)

**Representing:**

Organisation

**Organisation (if applicable):**

Genesis Association (Wales)

**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?:**

We consider that if people want pay TV, Sky already as dominance on satellite, we feel that there is little or no competition on satellite.

We consider any further move by a multi national to remove FTA and replace it with pay, its own channels now, will create less competition. Thus against the public interest.

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

We consider it will deliver no benefit whatsoever.

In fact pay tv creates less benefit, especially to those who can not afford to pay, or do not wish to pay to watch television.

We only see benefit to the Company who will remove three FTA channels for pay tv.

**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 already sufficient pay tv on DTT, We consider more pay tv will take away space that could be provided to FTA, Sky already dominates pay tv on Satellite and we feel no more pay TV is required, already sport is covered by Setanta if required, again this takes sport out of the reach of many with little means.

**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?:**

Due to space constraints on DTT, the key aspect will be to take programmes out of the reach of people who can not afford to pay into watching programmes. Or do not wish to pay out of choice

**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?:**

If Sky were the only provider, as with Satellite, no competition could be foreseen. As the boxes that decode would be limited to its content.

**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?:**

Our concern is that a majority of people with little means will not be able to afford to pay and this will have a detrimental on choice.

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

Consumers are already confused, any change prior to total switch off of analogue should be withheld, any extra boxes/adapters will add cost and create more use of power.

Consumers for example only think Sky is satellite and there is no option, this creates a similar confusion.

**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?:**

Our opinion is that there is already sufficient pay tv without more going onto DTT.

No further STBs should be used, or need to be used

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

Yes, due to Sky Televisions dominance in pay tv, we feel further inroads of pay tv into DTT will in itself create policy problems and thus concern.

**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?:**

Due to Skys dominance of pay tv already, We fear additional conditions will be of little value, We feel that if Sky did gain acceptance a break up of its satellite stranglehold should be a condition of its use of DTT.

**Additional comments:**

We are concerned that cost alone will cause a lot of people who are disadvantaged already, including the older person to feel further remote, as television is to some the only pleasure they get.

We consider that there is already too much Pay TV in the DTT/freeview area and no more should be accommodated. Removing three FTA channels by Sky should be replaced by three other FTA channels.