

S4C response to "Proposed BSkyB Digital Terrestrial Television Services Consultation"

14 December 2007

S4C is of the view that innovative proposals for the DTT platform should be encouraged. Normally if the platform had been technically stable in terms of the type of transmission and hence the set top boxes that would be required to receive services, we would agree with granting the licence under option 2. That is consent to the proposal subject to imposing additional conditions.

However this is not the case as there is now discussion of Mpeg4 and DVBT2.

Hence there is great risk of a multitude of types of boxes surfacing over the next two years dependent on the rollout of various standards, and the desire by Ofcom and the broadcasters to enable ever greater efficiencies on the platform. Couple this to the scenario of various incompatible CA systems and we have the possibility of great confusion amongst the viewer.

The need to purchase a specific set top box that may be incompatible with current pay services is of concern as it will have the effect of limiting choice for the consumer once they have bought the hardware. Therefore a simulcrypt CA should be mandated for all new pay service providers in order to ensure that the problem is not promulgated further. Should the existing TUTV service require to change in future, the opportunity should be taken to move it (or its replacement) to a Simulcrypt system also.

In addition, we believe that it should be mandated by Ofcom that the BSkyB box must be able to receive and display all free to air services in the manner in which they are intended to be delivered. Also that Sky will not be able to charge users of this STB for access to any of the PSB or other services that are available free to air on the DTT platform. Also that the boxes must meet or exceed the DTG STB receiver specifications including that for MHEG middleware and access services.

All the above is important in our view to ensure that any new service that is launched based on a proprietary box will be compatible with, and able to receive all existing services in order to prevent any creation of a "walled garden" of channels.

As a PSB we believe the current freeview aspect of the platform is a very strong message to viewers and should be protected at all costs by suitable regulatory safeguards.