

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: **Self help TV relays and digital switchover**

To (Ofcom contact): **Sairah Majeed, TV Planning and Licensing**

Name of respondent: **Graham Plumb**

Representing (self or organisation/s): **BBC**

Address (if not received by email): **N/A**

### CONFIDENTIALITY

What do you want Ofcom to keep confidential?

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Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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Name            Graham Plumb            Signed (if hard copy)

## **BBC RESPONSE TO SELF HELP TV RELAYS AND DIGITAL SWITCHOVER**

### **Introduction**

1. The BBC welcomes the opportunity to respond to this consultation. The BBC and the IBA established the principle of self help TV relays in the 1970s, and they have since been adopted by hundreds of small communities across the UK. They have become an important part of the UK's integrated terrestrial TV delivery infrastructure.
2. With the advent of UK-wide digital TV and the switch-off of analogue television, the requirements for self help relays will change. In particular, the areas where they are required may be different from the areas that currently require analogue self helps; and it may not be possible to predict accurately which areas will be in need of a self help relay after switchover. The distinction made in this Consultation between areas currently served by a self help relay, and areas not so served, gives rise to some potential contradictions: these will be addressed further in the responses to the individual consultation questions.
3. The BBC would welcome the development of a standardised equipment specification for digital self help relays by a recognised industry body. This will help to ensure a cost-effective technical solution that would maintain technical standards and does not degrade network performance.
4. Implicit in the consultation is that the self help relays must be compliant with the relevant DVB-T standards. The BBC would also support a requirement that the self help relays must re-radiate an unaltered form of (that is, with the same coding, multiplexing and modulation as) the received DVB-T signal.

### **Response to individual questions**

*Question 1: Do you agree with Ofcom's proposal to license digital self helps for areas currently served by a self help relay, and how we propose to make licences available? If not, please give your reasons.*

5. The BBC agrees with Ofcom's proposal to licence digital self help relays for the areas listed in Annex 7 of the Consultation.

6. The current prediction models referred to in Paragraph 3.17 of the Consultation would not normally reveal the small-scale deficiencies of service that self helps are typically designed to fill. Thus, the condition in Paragraph 3.11 that a licence will be issued “provided a self help relay is still needed in that area... after DSO” might not be confirmable until after DSO. The licence should contain provision for such cases.
7. The BBC supports Ofcom’s proposal, in the event of competing applications for the same area, normally to award a licence to an incumbent operator in order to increase the likelihood of continuity of service.

*Question 2: Do you agree with Ofcom’s proposal to license digital self helps for areas not currently served by a self help relay, and how we propose to make available licences? If not, please give your reasons.*

8. The BBC generally agrees with Ofcom’s proposal to licence digital self help relays in areas not currently served by an analogue self help relay.
9. While supporting the principle that the cost of frequency planning for such self help relays should be met by the self help operator, the BBC has concerns that Ofcom does not specify who should carry out such frequency planning. The BBC therefore considers it essential that any frequency plans for self help relays be cleared by Ofcom, on the basis of not causing interference to the broadcasters’ DTT network, before such relays are brought into service.

*Question 3: Do you agree with how Ofcom proposes to deal with the frequency planning for self help relays? If not, please give your reasons.*

10. The BBC supports the principles of frequency planning for self help relays laid down by Ofcom.
11. In particular, the BBC supports the proposed use of active deflector technology to maximise efficient use of spectrum. It is recognised that this will, on occasion, move services “out of group” for consumers’ existing rooftop antennas. On balance, the BBC feels this is an acceptable compromise between ease of use for consumers and spectrum efficiency.

*Question 4: Do you agree with Ofcom's proposed fee for WTA licences for self help relays? If not, please give your reasons.*

12. The BBC believes that the proposed WTA licence fees are proportionate given the small-scale of the typical self help licence, and bearing in mind the requirement for licensees to bear the capital cost of the equipment used.