

**Title:**

Mr

**Forename:**

J Adrian

**Surname:**

Pickering

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

J Adrian Pickering

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

N/A

**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: 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 available licences? If not, please give your reasons.:**

No - positive efforts should be made to help existing users to look at alternatives. Those that use transposers make use of a considerable portion of interleaved spectrum space, albeit in a small area. Every effort should be directed at preventing this since they would not (under these proposals) be paying a market rate. The BBC (or its agents) should be sympathetic to existing users and the suggestion of waiving the consultancy fee is probably appropriate.

**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.:**

No - more effort needs to be expended in solving these problems in a way that does NOT use interleaved spectrum space. Since it is the BBC's special mandate to do this during switchover, I would recommend that they (or their agent) be the source of advice. See below regarding how possible spectrum space may be negotiated. I would recommend a modest consultancy fee in order to be confident of a genuine community interest.

**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.:**

No - interleaved spectrum space needs coordinated management since it is being used by other services, some as yet unknown. As a user of JFMG's services in this regard, I would recommend that an organisation like this is used to plan, license and coordinate ALL users of interleaved spectrum space.

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

No - it is not market-realistic or fair. In many cases viewers have had to invest in satellite equipment to solve their reception problems. This should be used as a benchmark for setting the licence fee. Interleaved spectrum - however managed - should be generating a licence income and self-help relays need to fit into that pricing structure. A per-served-user fee would be fairer. More work is required here.

**Additional comments:**

I am concerned that OfCom have not taken a consistent approach between the needs of self-help TV relays and other users of the UHF spectrum (e.g. PMSE use). Indeed, the consultations are running concurrently and do not make reference to each other. I do not see any mention of self-help TV relays in the Aegis technical study for the DDR consultation.