

# Association of Service Providers

---

Edgcott House Lawn Hill Edgcott Aylesbury Bucks HP18 0QW  
Telephone +44 (0)1296 770458 Fax : +44 (0)1296 770423  
Email: [info@aspfm.cc](mailto:info@aspfm.cc)

Friday, 05 April 2002

## Digital Television: The Principles For Spectrum Planning

Further to our reply of the 14 February, we have considered the Cave report in the context of this consultation and find our members deeply concerned in the content and tone of the report.

ASP will provide comments on the report to the review but a few major points are listed below.

Whilst the report extols the virtues of spectrum auctions and spectrum pricing it does not consider the full effect on the UK economy of these actions. The 3G auction which is held up as a success has also had a major downside in depleting the industry of cash flow and has helped destabilise the whole communications industry deepening the problems it already faced. In many ways the auction has achieved the exact opposite of the purported objectives especially in the area of depleting funds from the system roll out and the job losses incurred.

The report has "cherry picked" the perceived advantages to the Government coffers and "spectrum efficiency" without taking the lessons learnt by other administrations such as the FCC into account.

The tone of the report appears to suggest that we should "re-examine" in a more liberal way various international agreements, having been involved in the drafting of a few such agreements this could prove a very dangerous policy to the UK economy.

Much of the Cave report concentrates on the companies and users who are in a position to pay large amounts of money for Spectrum **BUT** the earlier and existing non government spectrum management organisations in the SAP/SAB arrears i.e. ASP FM and JFMG did not have and would not have the vast cash mountains to purchase spectrum available to other companies or industries. The damage to the UK economy of taking this route would be considerable, brief examples of the income derived by "UK Ltd" from the SAP/SAB industry where given in our earlier response.

The Cave report along with the consultation document have taken a superficial view of the use of the present UHF TV bands 4/5 without any detailed consideration (or alternative spectrum) for the many other users, the complex interaction between them or the unique nature of the equipment in use. Further work should urgently be carried out in order to safeguard an important income to "UK Ltd"

***The combined effect of this review with its proposals to decimate the spectrum at present used by SAP/SAB equipment and the Cave report are having a major effect on UK equipment manufactures who have found the market place disappear in recent months as users will not purchase new equipment whilst there is such uncertainty on spectrum. We urge an early public debate and decision on this issue in order that further job losses can be avoided. As a minimum there should be a public statement that access to band V will continue to 2010.***

