

7 March 2002

Jane Humphreys
DTT
151 Buckingham Palace Road
London
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Catherine Smadja
DCMS
2-4 Cockspur Street
London
SW1Y 5DH

Dear Jane and Catherine,

Response to the Government's Consultation Document on Spectrum Planning

Carlton Studios, Nottingham, is Carlton Television's major production centre based in the East Midlands. Our core operation is to produce broadcast television programmes for the ITV national network. The programme range covers situation comedies, young people's, dramas, light entertainment, gameshows, quiz shows and indeed all the genre of programme making. These programmes are seen by many millions of viewers. We also produce regional programmes which is part of Cariton TV's franchise licence commitment in the Midlands.

Within the 470 - 862MHz Band :

Carlton Studios comprehensively uses wireless equipment in the following applications:

1. Radio Microphones:
For the voices of individual performers, presenters and reporters. Also for sounds from musical instruments.
2. In-Ear Monitors;
For personal monitoring of a sound track or the programme output by performers and presenters.
3. Talkback;
For communicating the instructions of the director instantly to all those directly

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involved in the production. These include presenters, commentators, reporters, cameramen, sound operators, lighting operators and engineers.

The use of this wireless equipment has grown to meet production demand for greater complexity of all forms of programme, achieved without increased costs from additional production time and staffing.

It is equally true to say that going backwards to wired cable methodology is completely impractical, given the efficiencies of modern day television production and the level of programme sophistication that is currently acceptable to the viewing public.

To meet our statutory obligations to the ITC, we have to use full bandwidth equipment, with a value on this site alone in hundreds of thousands of pounds.

We cannot, therefore, technically or operationally make use of digital compression technology, similar to the Digital TV Transmitters, to achieve improved spectral efficiency, in these applications, were it available at present.

Another proposal for future use of spectrum around 1.8Ghz has raised queries about Health and Safety by manufacturers, as our applications would require continuous radiation at these frequencies, rather than the intermittent use of equipment such as Cell-phones.

Our existing radio facilities are therefore all essential and vitally important to the operation of the business. Without them the business would cease to operate. The economic and cultural impact in the Midlands and the UK generally would be catastrophic.

It is essential therefore that the impact of the proposed switchover is fully understood and appraised because it has far reaching implications in terms of television programme production, licence commitments and jobs in the Midlands.

With respect to the above and the document:

Digital Television: The Prospects for Spectrum Planning

We fully sign up to JFMG's response to the Consultation Document.

We, therefore, strongly urge the respective Government Agencies to perform a more vigorous analysis of the impact on television-making than this proposal suggests. It would seem ironic that the focus of attention is on the big picture and the commerce of frequency sales of existing TV Transmitters, and the upper reaches of technological development whilst, completely ignoring the practical realities of use of today's technology/spectrum by production facilities for the TV industry.

Yours sincerely



Paul Flanagan
Operations Director

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