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From: PT Bigwood
Sent: 12 March 2002 02:03
To: Jane.humphreys@dti.gsi.gov.uk
Cc: Catherine.smadja@culture.gsi.gov.uk
Subject: DIGITAL TELEVISION: THE PRINCIPLES FOR SPECTRUM PLANNING

Comments on the consultation document
from an interested member of the public.

Since 1960, there has been a consensus among governments that the 4 primary terrestrial channels would be made available to >99% of the population via the UHF network. That infrastructure is now in place. I believe that the UHF TV network in the UK has been a great success and a bit of planning policy of which the government can be justly proud.

The consultative document says the target for digital coverage is 99.4%, the same as analogue, but it is clearly pushing the satellite fill-in route rather than converting all 1100 existing UHF sites to digital.

In 10 years time, all TVs, portables and videos sold will have a built-in terrestrial digital decoders and small cheap decoders boxes will be available for legacy equipment. People across the UK will rightly expect to be able to continue using all these sets in the same way after analogue switch-off. They will, after all, have purchased the prescribed equipment. The only way of providing as good a service is to switch the entire existing UHF network to digital. To do less will provide an inferior service. Fixed cable with its obligatory subscription and satellite with its need for a fixed dish and conditional access greatly limit the use of licensed TV equipment.

The consultation document points out that extending digital coverage to the entire UHF network will not, of itself, greatly reduce the number of UHF frequencies available for release to other services. It also assumes that the public services (BBC, ITV, C4/5, etc) should retain the allocation of 2 multiplexes. This element would require a total of just 12 UHF frequencies.

I would argue that the UK configuration of digital terrestrial TV makes its use for Pay TV services uncompetitive. The huge and ever increasing number of channels available on cable and satellite cannot possibly be matched by the UK's limited Pay TV terrestrial service which is being offered at similar subscription rates. This is becoming clear when one looks at the troubles of ITV Digital. The decision as to the extent of the conversion of the UHF network should be taken on the needs of the public service channels as the Pay TV element may not be commercially viable in the future. In fact, the failings of terrestrial PayTV may now be a hindrance to the required uptake of terrestrial digital TV.

The consultation document mistakenly says in para 1.13 that "viewers are only likely to be persuaded to go digital on [satellite and cable] platforms by the pay-tv services" so terrestrial digital should "support both free-to- view and pay-tv services". But customers are voting with their feet. They see that cable and satellite offer a vastly greater number and better choice of services at a similar price to terrestrial digital. Only by using the entire UHF spectrum and switching encoding standards to enable single frequency networks could terrestrial digital start to compete with cable and satellite. This is clearly not practicable.

Extending Mux 1 and 2 to the entire UHF network with up to 14 free-to-air channels is the most promising way to encourage the viewer to take up digital TV and to gain the understanding of the general public (often referred to as the voter!). They will understand the

advantages as they did
with the move to 625 line/PAL which added BBC2 and colour. Pay TV
should be left to the market. Clearly satellite and cable are the
preferred options but if the market sees a future for delivery by
digital terrestrial, they can negotiate for UHF spectrum with the
treasury. With the entire
UHF network converted to digital for the use of the
public services, the treasury will be free to offer additional
frequencies as or if the market demands.

Peter Bigwood