

OUR RESPONSE TO THE CONSULTATION ON  
DIGITAL TELEVISION: THE PRINCIPLES FOR SPECTRUM PLANNING

1. Public Voice is a voluntary sector network established to support, defend and protect public service broadcasting in all its forms, now, and in the future. It represents the interests of voluntary and community organisations, the causes they serve and their constituents. Public Voice campaigns to ensure that communications reform is led by public interest objectives, such as plurality of voice, impartiality and objectivity in news, diversity and quality of content, right across the market.

2. The Public Voice steering committee is made up of a number of agencies who have particular expertise in the voluntary and media sectors (Broadcasting Support Services, Campaign for Quality Television, Community Media Association, the Media Trust, Third World and Environment Broadcasting Project [3WE], and the Voice of the Listener and Viewer), and we also have a wide and active membership of voluntary and community groups. Current supporters and members include: NCV0, The Kings Fund, World Wildlife Fund, RSPB, NIACE, CAFOD, Age Concern England, Childline, the Dyslexia Institute, RNIB, RNID, Oxfam, CSV Media and the British Deaf Association.

3. Public Voice has commented in detail on a number of recent policy proposals and consultation documents including: the Government's White Paper on Communications Reform; Professor Cave's Radio Management Spectrum Review; the BBC's proposals for new digital services; ITC consultations on restrictive service licenses and on cross promotion; the Government's draft digital action plan; the Towers Perrin scoping report on OFCOM; the Culture Media and Sport Select Committee's inquiry into communications reform; and the Government's consultation on media ownership. We are also represented on the stakeholder and market preparation groups established as part of the Government's digital action plan programme.

4. We welcome the opportunity to respond to this consultation on the future allocation of spectrum, and in particular on the following questions:

\* How much spectrum should be allocated to digital terrestrial television? Of that spectrum, how much should be allocated to public service broadcasting and how much to pay-TV?

\* What level of coverage is required by terrestrial television for public service broadcasting, and for pay-TV services?

5. We welcomed the Government's announcement in September 1999 of the criteria to be reached before analogue terrestrial television broadcasts could be switched off, namely that:

\* everyone who currently receives free-to-view analogue TV channels (BBC 1 and 2, ITV, Channel 4/S4C and Channel 5) must be able to receive those channels digitally (target: 99.4% coverage to compare with current analogue terrestrial figure for channels other than Channel 5)

\* switching to digital must be an affordable option for the vast majority of people (target: 95% of consumers have access to digital equipment)

6. We are sceptical, however, about the statement in this consultation document that switchover could still be achieved by 2010. The economic opportunities offered by digital cannot be properly realised whilst vast numbers of the UK population are discouraged or prohibited from accessing digital television and radio services because of the cost. We also seek assurance that individuals, particularly those on limited budgets, will not be forced into early switchover as no one should be deprived of minimum services. Unless the Government extends its goal for DTT beyond the suggested 72% reach, and takes steps to ensure the costs of accessing DTT are reduced, the goal of having 95% of consumers with access to the main PSB channels free to air by 2010 seems unlikely to be realised. With only around 33% of households currently having access to digital television, (via cable, satellite or terrestrial), there is still a long way to go.

7. We welcome the commitment in this paper to free up spectrum in a way that maximises future options. We hope that the interests of citizens and consumers

will be at the heart of future decision making, recognising the important part that television, and public service broadcasting in particular, plays in involving, educating and informing the UK community. For this reason we welcome the recognition in 1.6 of the consultation paper that spectrum should be allocated according to social as well as economic values.

8. We welcomed the statements in the Communications White Paper A new future for communications, that  
\* digital BBC1, BBC2, ITV, Channel 4/S4C and Channel 5 will be available free at the point of viewing to all those who are currently able to receive the analogue versions of those channels

\* these channels (plus any other public service channels and a public teletext service) must be carried on cable and satellite.

The Communications White Paper said that public service broadcasting would be more important than ever in the future. This commitment must be underpinned by real obligations for broadcasters and providers to continue to make such services available to all, (throughout the forthcoming communications legislation), and supported by an appropriate allocation of spectrum in the future.

9. We welcome the statement in this paper that competition between the three digital platforms will be encouraged so that choice is available to viewers and listeners. We agree that the amount of spectrum allocated to digital television needs to be sufficient to support both public free-to-view services and pay-TV services since both will be available on cable and satellite.

10. We oppose the suggestion that the digital equivalents of the analogue free-to-view services (BBC1, BBC2, ITV1, Channel 4, S4C and Channel 5) could be supplied by a single multiplex. We agree with the paper's assertion that this would take no account of the Government's commitments to public service broadcasting and that it would mean that free-to-view public services could not be a key driver in the take-up of digital television.

11. The alternative suggestion that two multiplexes should be maintained for use by the public service broadcasters only seems a more favourable option.

12. However, on balance we support the suggestion in 2.6 of this paper that one or more further digital television multiplexes should be licensed, allocating ITV and C4 separate multiplexes and also allowing Teletext, S4C and Channel 5 to expand their services. We believe this additional allocation of multiplex should only be granted on the basis that this would result in expansion of opportunity to view free to air services as well as pay to view services, requirements on service delivery could be regulated by OFCOM. There should be a specific requirement for broadcasters and digital multiplex holders to commit sufficient investment to new and innovative public service digital services and technologies, in order to widen choice and diversity for citizens at a local, regional and UK-wide level. We recognise that increasing the number of multiplexes available to digital television would mean that less spectrum is available for other purposes but believe that this allocation is necessary to ensure sufficient availability of new public service free to air services in future.

13. We welcome the paper's commitment to supporting existing regional services and to do so on an interleaved basis.

14. We wholeheartedly welcome the commitment to developing a spectrum plan that gives the holders of Restricted Service Licences a clearer indication of long-term prospects for local television services. We believe that the future planning of this spectrum must take full account of the provision of local services and express a real commitment to new and innovative forms of programme making and distribution for public service broadcasting, including community radio and community television.

15. The question of the costs of converting transmitter networks to ensure that sufficient households can continue to receive free to air public service programming after switchover is a crucial one and one which must be at the heart of spectrum management. This paper estimates an investment by BBC and Digital 3 & 4 of £100 million to be sure of reaching every household that can currently

receive their analogue transmissions.

16. The consultation paper states that costs to the broadcaster could be reduced if satellite was used to enable access to some areas that are difficult or very costly to reach by terrestrial. However, this would mean additional reception costs for consumers. The relative costs of buying new equipment such as a satellite dish or new aerial need to be similar so that those consumers who are unable to receive digital terrestrial television at all are not unduly disadvantaged by these costs.

17. We believe that consumers should have a choice of at least two platforms at a reasonable cost to themselves.

18. We support the proposal that public service broadcasters should be required to reach a certain minimum percentage of households by the terrestrial platform. The digital platform will be the only one through which consumers will be able to access free to air public service channels without subscribing also to pay to view services. In future, as the cost of integrated digital television decreases, this could become an increasingly attractive option for many consumers. We believe, therefore, that public service broadcasters should be required to reach 85% of households by the terrestrial platform.

19. We agree that the level of coverage provided by the networks supporting the four multiplexes carrying predominantly pay TV services should be governed in part by the commercial judgement of the operators, but believe that there should also be some requirement for public interest to be taken into account. Viewers who are willing to pay for TV should not unreasonably be excluded from accessing such services. A minimum level - much lower than that required for public service broadcasting - should be set so that viewers in remote areas which are expensive to reach will not be unduly disadvantaged.

20. In deciding which frequency channels to clear, due attention should be paid to the interests of consumers and the potential costs of purchasing new aerials in order to accommodate a change of frequency channel. We do not believe that the consumer should bear the burden of additional costs that are beyond their control. Further work is needed on considering the frequency changes so that an appropriate balance can be struck between protecting the interests of consumers and meeting the commercial and technical needs of the telecommunications industry.

Public Voice  
12th March 2002

#### The Public Voice Steering Committee

Broadcasting Support Services is a charity which has been devising and providing flexible solutions to the public and voluntary sectors and broadcasters since 1975. It offers a full range of services including short- and long-term telephone helplines, donation processing, publishing, new media, fulfilment, Welsh bilingual services and consultancy. BSS provides office space and management support for the Public Voice campaign.

The Campaign for Quality Television was set up in 1988 to express the concern of programme makers about the then proposed de-regulation of television. After intensive activity around what became the 1990 Broadcasting Act it was re-launched in 1995 and has since published two major reports on the state of British broadcasting. The campaign exists to: promote the value public service television; ensure choice and quality for all viewers in the UK; ensure that public service television is adequately funded; to promote public debate about television; and to persuade legislators towards policies which are creative and imaginative and which treat the viewers as partners in the enterprise of television rather than simply as sources of revenue.

The Community Media Association (formerly the Community Radio Association) was founded in 1983 by audio production workshops, community radio projects, social

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action broadcasters, media activists and academics. It was set up with the aim to support a third sector of community media services alongside commercial broadcasters and the BBC.

The Media Trust works in partnership with the media to meet the communications needs of charities, voluntary organisations and community groups. It provides advice and support from media and communications professionals for the voluntary sector, makes videos and television programmes for and about the voluntary sector, offers volunteering opportunities for media professionals, and runs the Community Channel, a television channel for the voluntary sector.

The Third World and Environment Broadcasting Project (3WE) is a coalition of non-governmental organisations concerned with international development, environment and human rights issues. It works for sustained, imaginative and fair media coverage of developing countries, their people and the environment in which they live. 3WE's membership consists of the following leading non-governmental voluntary organisations: ActionAid; Cafod; Christian Aid; Comic Relief; ITDG; Oxfam; RSPB; Save the Children; United Nations Association-UK; Unicef UK; Voluntary Service Overseas; Worldaware; and the World Wide Fund for Nature.

The Voice of the Listener and Viewer is an independent non-profit making association representing the interests of listeners and viewers across the UK. VLV is concerned with the structures, institutions, funding and regulation that underpin the British broadcasting system, and in particular with the principle of public service in broadcasting. It has over 2,000 individuals, nearly 50 academic departments and organisations and nearly 30 corporate organisations in membership, including RNIB, RNID, RSPB, NSPCC, NFWI, Age Concern England, Help the Aged, IBT and the Parkinson's Disease Society.

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Steering Committee  
Broadcasting Support Services  
Campaign for Quality Television  
Community Media Association  
The Media Trust  
The Third World and Environment Broadcasting Project (3WE)  
Voice of the Listener and Viewer

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