*"Working for quality and diversity in British broadcasting"*

**Founded by Jocelyn Hay in 1983**

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# Digital Television: The Principles for Spectrum Planning

## Submission by Voice of the Listener & Viewer (VLV) To a consultation by Department for Trade & Industry and Department for Culture Media & Sport

April 2002

VLV welcomes the opportunity to answer questions posed in Digital Television: The Principles for Spectrum Planning, VLV submits its conclusions concerning use of the present UHF Bands IV & V for Digital Terrestrial Television, based on the information currently available from various sources including the Digital Television Project (part of the DCMS's Digital Action Plan), The BBC, BSkyB, Crown Communications and Professor Cave's 'Review of Radio Spectrum Management'.

## 1. Allocating spectrum to digital terrestrial television

### The number of multiplexes

***Question 1 Page 7***
***Our working assumption is that planning will continue for six multiplexes, as today. However we would also be interested in views on the costs and benefits of a more radical re-planning. This could be either reducing or increasing the number of multiplexes by one. Do you have views on this?***

1.1 VLV considers that the public policy objections should be to achieve 100% coverage for public service broadcasters and to prepare for the planning required for the development of interactive public service channels, including the proposed government information service channel, and any currently unforeseen opportunities.

1.2 VLV therefore considers that the allocation of the three multiplexes to ITV digital should be reviewed in order to establish whether it might be easier to meet these objectives if one or more of the multiplexes B, C or D is allocated for public service use.

***Question 2 Page 8***
***What do you see as the costs and the benefits of maintaining the current basis for network configuration compared with those for adopting a configuration using fewer frequency channels?***

1.3 VLV believes that the benefits which accrue from adopting a configuration using incremental frequency channels should be passed on to viewers in general. If any benefits arise from the sale of available spectrum, these should be used to cover the cost of the new network configuration.

1.4 VLV considers it essential that the technical quality of the sound and vision signal in all multiplexes with a public service requirement to universal transmission should be maintained with no reduction in the overall standard of transmission.

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***Question 3 Page 8***
***Do you agree that we should continue to plan on an interleaved basis to support regional services?***

1.5 VLV agrees that the policy should be to continue to plan on the basis of muxes being interleaved.

***Question 4 Page 8***
***To what extent should the future planning of this spectrum take account of the provision of local services?***

1.6 VLV suggests that **ONE** channel in each mux should be allocated for local, regional or government use?

***Question 5 Page 9***
***What factors would have to be taken into account in order to plan to suport mobile brodcasting services?***

1.7 There is confusion and VLV would welcome clarification about the precise obligation to 'mobile broadcasting services'.

1.8 Reference para 2.13, We question the interpretation of lines 3 and 4…"reception of digital broadcasts by **set-top aerials** could be at least as good as analogue". If a receiver is able to receive a digital signal of adequate level it will give a result. If the digital signal strength is not sufficient, due to a poor aerial or other factors (eg. At the limit of transmission coverage), then the receiver will receive nothing at all. Although the analogue picture being received by the viewer today may be noisy, fading and distorted, it is acceptable to many people, whereas we suspect that the alternative of receiving nothing may be unacceptable. Either receivers must be designed to be more sensitive or transmitter power must be increased. The same problem applies to video cassette recorders.

## 2. Coverage required for terrestrial television for public service broadcasting and for pay-TV services

**Public service broadcasting**

**Question 6 Page 11**
***Does this analysis of coverage potential and associated costs adequately inform those taking decisions about the level of coverage by terrestrial means that should be required for public service broadcasters?***

2.1 VLV disagree. See comments below

***Question 7 Page 11***
***Our working assumption is that the public service broadcasters should be required to reach a certain minimum percentage or households by the terrestrial platform. However, we would like your views on whether it is right to require a minimum, what that might be and the associated costs and benefits?***

2.2 VLV believes that the BBC must be "required to reach a certain minimum percentage of households" using only the terrestrial platform and that the commercial television companies should be encouraged to meet similar obligations.


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2.3 This however could place enormous pressures on the BBC if it had to fund alone the costs of the many transmitter sites it currently shares with ITV. The BBC may thus need extra support if the commercial companies are each permitted to withdraw from these obligations.

2.4 In his recent report "Review of Radio Spectrum Management", Professor Martin Cave proposes that spectrum be utilised more efficiently. He suggests that cable TV companies could become a much more cost-effective and viable alternative to the use of the TV spectrum.

**Pay-TV Services**

***Question 8 Page 12***
***Do you agree that the level of coverage provided by the network supporting the four multiplexes carrying predominantly pay-TV service should be left to the commercial judgement of the operators?***

2.5 See answer to Question 7 above

## 3. Clearing spectrum for re-use

3.1 Page 13 para 4.4 identifies "…delivering broadcast TV and mobile multi-media services to moving vehicles…" If this is a possibility, why could it not also be used for second and third TV receivers in the home via set-top aerials?

***Question 9 Page 14***
***Which channels are cleared will depend on the costs and benefits of different re-planning options. For example clearing 5 channels at the top and bottom of the frequency range is less disruptive to consumers and has lower switching costs than clearing ten at the top end. The benefits, though, will depend on the use to which such freed up spectrum can be put. We would like your views on the costs and benefits of different options.***

3.2 The principal aim must be one of minimum disruption of normal TV services to the viewer. VLV believes it is vital that the public is kept informed at all times of new developments.

***Question 10 Page 14***
***Which frequency channels should we clear?***

3.3 In answer to this question, the frequency channels to be given up are those at the top end of Band V. These channels are, we believe, most likely to be those least used by the broadcasters.

Mrs. Jocelyn Hay
Chairman


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