



Communications Consumer Panel response to Ofcom's consultation: Future use of the 700MHz band.

Introduction

1. The Communications Consumer Panel welcomes the opportunity to respond to this important consultation on the potential reallocation of the 700MHz band.
2. The CCP is an independent group of experts established under the Communications Act 2003. Its role is to provide advice to Ofcom to ensure that the interests of consumers, including small businesses, are central to regulatory decisions. The Panel also provides advice to Government and champions consumers' communications interests with industry. The Panel has members representing the interests of consumers in Scotland, Wales, Northern Ireland and England and the Advisory Committee for Older and Disabled people.

Consultation

3. The Panel welcomes this opportunity to contribute to Ofcom's planning for the use of the 700Mhz band. The Panel is particularly pleased that Ofcom is seeking views on the planning for 700Mhz band use at this very early stage, so that input and advice can be of maximum benefit.
4. We appreciate and understand the benefits that the allocation of the 700MHz band to mobile services would bring, but we urge that careful consideration be given to the impact that the change could have on Digital Terrestrial Television consumers - especially vulnerable people. The Panel considers that the digital switchover was well managed, especially for older and disabled people. We have also been impressed with the planning and, so far, the execution of work to mitigate potential interference from the 4G signal. Whilst the Panel thinks that these projects should be used to inform any support given to consumers following a re-allocation of 70MHz, it feels that the level of disruption should be carefully considered when deciding whether to reallocate this frequency.
5. The Panel would welcome further detail on the benefit of using 700MHz for mobile telephones, rather than the already available 600MHz. Whilst the Panel acknowledges that harmonisation amongst countries and continents is important to the spread of technology and economies of scale, it does not feel that the consultation sufficiently explained why this was important enough to be worth the considerable disruption that the reallocation would cause. Acknowledging also the disruption to the Programme Making and Special Events sector Ofcom's proposals,

if followed through, would require two sectors, consumers and PMSE, to experience considerable disruption only a couple of years after they were required to adjust their equipment or retune their apparatus.

6. We note, and welcome, the benefits of handset costs potentially being reduced as a result of the harmonisation of mobile bands between countries; but we note too that there is only a possibility that other countries will allocate 700MHz for mobile use. We therefore feel that any benefits to consumers, to consumers, in terms of handset price reductions, should be carefully assessed and qualified.
7. The Panel is pleased that the consultation acknowledges that Ofcom's primary duty is furthering the interests of citizens and consumers, and hopes that this is reflected in any detailed proposals when they are published. We also welcome the studies that will take place so that Ofcom can have a better understanding of the costs and benefits of the spectrum reallocation; we recommend that these include the costs and benefits to consumers. The Panel believes that the costs associated with any change in spectrum allocation, should be borne by business rather than consumers. Although, as Ofcom predicts, there will likely be some benefits to consumers, the primary benefit, in terms of profit and technological opportunities will be with the phone manufacturers and network operators, they should therefore bear the cost of any change.
8. Although the consultation acknowledges that any proposals should maximise the benefits to citizens and consumers, it says that it will *only* do this 'in so far as possible and consistent with our UHF Strategy'. The Panel feels that given that furthering the interests of citizens and consumers is Ofcom's primary duty, consideration of their needs should not be secondary to the UHF strategy but primary to it.
9. The Panel welcomes the consultation's acknowledgment that any reallocation of 700MHz would have a significant impact on consumers, especially in terms of new equipment that might be required. As some consumers may be required to buy and install new aerials or receivers, it is important that Ofcom takes account of the needs of consumers as early as possible in the planning process, especially those who may be less able to understand what is required and/or carry out any work. To this end the Panel welcomes the consultation's acknowledgment that vulnerable consumers will need particular consideration and information during any transition. The Panel is heartened by the advance planning that is taking place and would encourage Ofcom to make as early contact as possible with equipment manufacturers to ensure that sufficient and correct equipment is in place in advance of any switchover.