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## Communications Consumer Panel response to consultation on Securing long term benefits from scarce spectrum resources - A strategy for UHF bands IV and V

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The Communications Consumer Panel (CCP) welcomes this opportunity to respond to the consultation on *Securing long term benefits from scarce spectrum resources - A strategy for UHF bands IV and V*.

The likely global harmonisation of 700MHz for mobile broadband has the potential to bring about significant benefits for UK consumers, not least of which is the provision of additional capacity to support the expected growth in demand for mobile data.

The Panel notes that the use of this lower frequency spectrum should enable fewer masts to be required to carry this data - resulting in lower costs for mobile operators and therefore, fewer costs to be potentially passed to consumers and better coverage. The harmonisation of 700MHz internationally also has the potential to deliver economic benefits to consumers in terms of internationally compatible equipment, including mobile handsets, and the related lower costs for manufacturers. The Panel is also pleased to note that Ofcom is considering potential future options of using some of the 700 MHz band to deliver multimedia based emergency services applications.

However there are also risks for consumers associated with this proposed harmonisation of the 700MHz band - in terms of their access to digital terrestrial television (DTT), additional costs (as a result of the need for new aerials and potentially filters) and confusion.

It is likely that DTT will continue to be an important part of the broadcast landscape for some years to come. It provides low cost access to PSB services and research suggests that DTT's free to air attributes are highly valued by consumers.

Turning to the question of whether the 600MHz band should be employed for DTT re-planning: from the information put forward in the consultation, it would appear that if the 600MHz band is not used for DTT after clearance of the 700 MHz band, there is a material risk that the DTT platform will have insufficient spectrum to continue to deliver important benefits (including providing universal low cost access to PSB content).

Conversely, re-planning the DTT platform using the 600 MHz band would appear to enable the DTT platform to continue to support viewers' choice for a range of channels similar to

those currently available and support more SD and HD channels - depending on the level of demand and the development of technology. Using 600 MHz spectrum, would allow the DTT platform to be able to continue to operate with six multiplexes and maintain PSB multiplex coverage. In the current economic climate, the Panel would caution against an approach which assumed a rapid take-up of second and third generation receivers and a high demand for HD services. The Panel would also be concerned if any future reception of DTT was dependent on having broadband access given that, as noted by the consultation, 25% of DTT households do not have a broadband connection and would have to incur the cost of acquiring broadband and the limitations of speed and reliability.

The Panel notes that the use of 700MHz for mobile broadband would require a frequency re-plan of the existing DTT platform and that one element of this is that it could create a need for some DTT households to use a wideband aerial. The likely impact of this is estimated to be in the order of 30% of households, in order to receive PSB and commercial multiplex channels. The Panel is aware that research suggests that 26% of aerials have already been converted to wideband aerials and that if 600MHz is utilised, this could reduce the number of households requiring a wideband aerial. However the Panel would caution against only using the 40% of homes which have DTT as their main platform as the basis on which costs are calculated, as many more homes use DTT as a secondary platform and will potentially be affected by these changes. The Panel would highlight the points made in its submission to the consultation on 800MHz coexistence - particularly in relation to the issue of filters.

Ideally, the potential co-existence issues that may arise with 700MHz would be addressed in combination with those arising from 800MHz. However recognising that this may not be possible at this stage, it is important that a clear communications strategy is established from an early stage - to alert both industry and consumers and:

- clarify the issues and separate them from digital switchover and 800MHz co-existence issues;
- highlight the need for the installation of wideband aerials rather than narrow band, where aerial replacement is occurring; and
- inform receiver manufacturers of the potential 700MHz harmonisation issues, particularly as this would be a pan-European situation, so that new equipment could contain appropriate filtering solutions.