



Response to Ofcom Consultation: Self help TV relays and digital switchover

Background

JFMG Ltd manages the spectrum allocated for use in programme making, entertainment, special events and related activities. JFMG coordinates the use of spectrum, issues licences and collects licence fees on behalf of Ofcom. JFMG has successfully managed spectrum for Ofcom (previously Radiocommunications Agency) since 1997.

In the UK, the professional use of radio for programme making and entertainment purposes is referred to as Programme Making and Special Events (PMSE). PMSE applications include:-

- Broadcast television studio production
- Broadcast television and radio coverage of news, sport or other public events including state occasions
- Theatre and touring shows
- Music and other entertainment productions
- Conferences, and corporate presentations and events
- Making advertisements and promotional material
- Production for multi-media and webcasting
- Movie film productions
- Public address systems at events and places of worship

Many of these demands make use of assignments in the UHF television bands and JFMG ensures their compatibility with television broadcasting and other radio services. The ability to manage these assignments is also applicable to frequency planning potential digital self helps and JFMG has the capability to assist applicants with frequency planning proposals and practical on-site survey work.

The full extent of programme makers' use of spectrum in the UHF television broadcasting band remains uncertain once Digital Switchover (DSO) commences. Based on JFMG's experience of managing assignments in the UHF television bands, this response seeks to highlight important issues that need to be addressed on the assumption that the band continues to be available to self helps and programme makers.

In the past JFMG, on behalf of programme makers, had the opportunity to comment on applications to establish new analogue self helps, though the number of instances was very small and comments made only where a severe impact on programme makers could be demonstrated. Post DSO, JFMG believe that digital self helps and programme making should continue to retain compatible access to as much of the existing UHF television bands as possible.

Consultation Questions

Question 1): *Do you agree with Ofcom's proposal to license digital self helps for areas currently served by a self help relay, and how we propose to make available licences? If not, please give your reasons.*

Fundamentally in cases where households rely upon an existing self help for their analogue television service there should be provision for these communities to apply to Ofcom to replace it with a new digital self help. However, now that alternative means of distribution exist, particularly satellite and cable in urban areas, a digital self help may no longer be required, except where all of the other alternatives are not practicable. Analogue self helps began in an era when there was often no alternative to terrestrial relays to supplement coverage.



The coverage of digital terrestrial services (DTT) post DSO will often be better, compared to the current analogue network, for example where current analogue reception is subject to serious multipath interference. In these cases, where an acceptable DTT alternative exists post DSO, then replacing an existing analogue self help with a new digital self help may not be required. If no acceptable DTT service exists then satellite or cable solutions may be an acceptable alternative.

In the past proposals for new analogue self helps have been considered by the Ofcom 'Television Planning Group' (TPG) to assess the technical compatibility of the proposal with existing terrestrial television and ongoing programme making assignments. JFMG on behalf of programme makers had sight of self help applications and the opportunity to comment if they were likely to cause unacceptable interference to specific programme making assignments. In recent years, where alternative DTT, satellite or cable solutions were available, TPG have occasionally declined applications and recommended that an alternative solution be employed to protect specific programme making assignments. Given that most existing self helps are in remote locations, replacement digital self helps are unlikely to cause difficulties to programme making. It is possible however that some future digital self helps may be requested for areas close to important programme making facilities. In these cases it is proposed that programme making assignments be considered carefully. If acceptable free-to-air alternatives are available then priority use of the spectrum should be considered for programme makers.

Questions 2): *Do you agree with Ofcom's proposal to license digital self helps for areas not currently served by a self help relay, and how we propose to make available licences? If not, please give your reasons.*

Post DSO it is possible that there will be some small areas, previously well served by the analogue network that may not receive an adequate DTT service. In these cases communities should be able to apply to Ofcom to establish a new digital self help. Acceptable alternatives such as satellite or cable may exist, so a digital self help may not ultimately be required. There should however be a mechanism for communities to highlight their perceived need to Ofcom and be able to submit proposed coverage solutions.

Question 3): *Do you agree with how Ofcom proposes to deal with the frequency planning for self help relays? If not, please give your reasons.*

Ofcom and the BBC are proposing to meet the costs of frequency planning for areas currently served by self help relays but additional communities that suffer unpredicted post DSO deficiencies in DTT coverage need to have coverage solutions for digital self helps investigated and considered by Ofcom.

The Ofcom funded Joint Planning Project (JPP) spectrum planners will be fully utilised investigating major DSO coverage issues. There should therefore be the opportunity for additional organisations to investigate and propose coverage solutions to Ofcom for the many small potential coverage deficiencies that arise. JFMG itself already routinely makes assignments in the UHF television bands and has the capability to produce proposals for digital self helps and support them with site surveys and coverage predictions.

Question 4): *Do you agree with Ofcom's proposed fee for WTA licences for self help relays? If not, please give your reasons.*

A modest administrative charge would be appropriate for future self help relays given the other significant costs in establishing a self help relay and that these costs are often borne by small communities.