

**Question 1: Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?:**

Alignment of Ch.69 with the rest of Europe is a good idea. It would also be good if PMSE frequencies could be harmonised across Europe, but this may be more difficult.

**Question 2: Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.:**

**Question 3: Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?:**

**Question 4: Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most consistent with the DTT migration criteria? If not, why not?:**

**Question 5: Do you agree that a programme-control and -governance arrangement such as that outlined above is appropriate?:**

**Question 6: Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and 62? Are there any costs that do not appear to have been accounted for in any of these categories?:**

**Question 7: Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?:**

**Question 8: Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?:**

I would refer you to BEIRG's response.

**Question 9: Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?:**

I would refer you to BEIRG's response.

**Question 10: Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?:**

I would refer you to BEIRG's response.

**Question 11: Do you agree that channel 38 is the best alternative to channel 69 for PMSE?:**

Yes, providing the radio mic manufacturers are happy to design their equipment to work in this band.

**Question 12: Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?:**

Yes, providing the costs to end users will be kept broadly the same.

**Question 13: Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months? notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?:**

**Question 14: Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?:**

No. You gave a cut off date as of your previous announcement of a possible move to Channel 38. This is entirely unsatisfactory. No decision has been made, so the manufacturers cannot start production of radio mics on Ch.38, so no-one can buy equipment on Ch.38.

The cut-off date should be not until all the major UK radio mic manufacturers have ramped up to full production of equipment on the new frequencies and such equipment is freely available to the end user. Only then should OFCOM consider removing funding for updating or replacing Ch.69 equipment.

Professional radio mics tend to have a working life of at least 10 years and still have a secondhand value after that period. So any funding assessment should be phased over at least a 10 year period, if not longer.

**Question 15: Do you agree that three years is long enough for PMSE to move from channel 69?:**

Yes, providing that Ch.38 equipment is freely available at the start of the period.

Yes, as long as Ch.38 is available throughout the UK at the start of the 3 year period. At the moment a large part of NW England is unavailable for radio mic use due to protecting radio astronomy use at Jodrell Bank. This use needs to be cleared away before the 3 year period commences.

**Question 16: Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?:**

I would refer you to BEIRG's response.

**Additional comments:**

This comment is in addition to my previous comments.