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VLV RESPONSE TO THE OFCOM CONSULTATION: SPECTRUM ROADMAP: DELIVERING OFCOM'S SPECTRUM MANAGEMENT STRATEGY

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INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

Response to Consultation

1. The VLV welcomes this opportunity to provide feedback on the Ofcom consultation: *Spectrum Roadmap: Delivering Ofcom's Spectrum Management Strategy*.
2. The VLV would welcome the opportunity to be actively involved as a stakeholder, representing the interests of citizens, as Ofcom develops these proposals further.
3. We appreciate the wide range of services that are delivered using radio spectrum and that Ofcom has responsibility to provide advice to government on how spectrum should be deployed to support both public and commercial services. This covers a wide field with implications for national security as well as for everyday business and personal communication.
4. Section 2 of the document is helpful in providing a detailed description of its duties and responsibilities as well as a summary of the scope of the radio spectrum at a technical level.
5. Also useful is Section 3 that provides a list of the items in Ofcom's current work plan included for reference.
6. We agree that increased flexibility in spectrum usage may be important in the coming years as demands for new innovative services emerge which attempt to meet civic as well as business and individual needs. This will require an ability to recognise and support innovation at an early stage from Ofcom as regulator. This can be achieved in several ways including developing better planning tools that have improved precision in predicting service coverage, interference levels and reception equipment performance.
7. Better data for improved spectrum management can be achieved from detailed analysis of services, their suitability for carriage using spectrum and much better knowledge of equipment performance limits. Similarly the greatest possible knowledge of radio wave propagation in the various spectrum bands will aid planning. In practice, reception at specific localities is hard to predict because it varies with time, geography and terrain. In this context there is a practical limit to the quality and accuracy of propagation prediction data.

8. Finding more capacity for new services as well as maintaining existing ones requires adaptation of the usage of the limited amount of spectrum available. Where the amount of spectrum is limited, network capacity can be improved by exploiting it more efficiently and that requires careful evaluation of planning rules. Doing so places demands on the performance of the equipment that supports services, especially receivers used by consumers.
9. It is vitally important to consider the performance of consumer reception equipment and its contribution to spectrum efficiency. Consumer electronic devices are generally built under cost constraints and so assuring high performance will be challenging.
10. It is also important to recognise that consumers will not wish to change their receiving equipment too often. The replacement cycle for TV sets is several years and so innovation must take account of the economic impact of excessively rapid change. The replacement cycle for mobile phones is shorter than that for TVs, being driven by continual development of operating systems and new handsets able to access new frequency bands.
11. Nevertheless, it is only the early adopters who follow the leading edge of these developments closely, with many subscribers maintaining use of handsets that may be several years old. This cycle is discouraged by handset manufacturers and network operators by reducing or withdrawing support for older devices.
12. We recognise the importance of the future work areas proposed. The rapid pace of technological developments is a challenge to spectrum users, both suppliers and consumers. Investment by both groups of players require time for their respective investments to return their value and so the speed of practical change will act as a moderating influence.
13. Whilst competition in the provision of services to consumers and industry is valuable, there is the risk of duplication in different parts of the available practical spectrum bands and some services need not necessarily always be delivered everywhere using spectrum. Spectrum scarcity implies a need to make available spectrum resources in the most appropriate bands for the services delivered eg WiFi, Mobile Data, Broadcasting, Military and public services (Clause 2.11).
14. It will also be necessary to require all spectrum users to make efficient use of their respective spectrum allocations.
15. Section 4 is valuable in outlining the context in which Ofcom's work plan is executed, in particular drawing attention to increasing demand for spectrum and the corresponding need to review its supply, given that it is a fixed resource. The growing pressure on this limited resource will certainly require careful analysis and timely and appropriate management.
16. VLV specifically notes Clause 4.16 referring to the 600 MHz band used for digital terrestrial broadcasting (DTT). Taking over the use of this band is a

target for mobile service operators. VLV has responded to several Ofcom consultations concerning the future of DTT and is opposed to any dilution of DTT access to spectrum. We are aware of a pending Ofcom consultation about WRC23 where the use of this DTT band will be discussed; we will respond to it in due course.

17. At this stage VLV does not believe that it is judicious or safe to relegate all public communications to online-only provision. The present wartime conditions in Ukraine have confirmed our view on this matter.
18. As broadband speeds improve with penetration of fibre to homes as well as to street distribution boxes, the pressure on mobile spectrum could be expected to ease. The capability of mobile handsets to use domestic WiFi allows much of the data traffic generated domestically to be offloaded. The added availability of local and regional WiFi “hotspots” also reduces the demand for mobile data.
19. The convergence of terrestrial mobile networks with other channels may allow appropriate offloading as conditions permit.
20. Spectrum sharing seems a laudable aim but it presupposes harmonised services that are able to share. The deployment of DTT and mobile technologies and their shared use of the same spectrum is not, in our view, a feasible option at the present time.