

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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RESPONSE BY THE VOICE OF THE LISTENER & VIEWER

TO OFCOM'S

CONSULTATION ON PREPARATIONS FOR THE WRC 2019

September 2018

Response of the Voice of the Listener and Viewer to Ofcom's consultation on its Preparations for the World Radio Conference (WRC) in November 2019

INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England No 4407712 - Charity No 1152136).

The VLV is committed to securing a healthy future for Free-to-Air (FTA) Public Service Broadcasting (PSB) and strives to protect its place in the communications market. We value in particular its wide range of content freely available to viewers and listeners through the media of Digital Terrestrial Television (DTT), Digital Audio Broadcasting (DAB) and some analogue transmissions of radio services.

SUMMARY

1. The VLV welcomes the opportunity to respond to the consultation on Ofcom's proposed approach to WRC 2019. We note the wide range of agenda items covering the many aspects of the radio communications field.
2. VLV has noted Ofcom's priorities in relation to the many agenda items and has no responses to the specific questions set out in the consultation document but we would be grateful if our comments on the issues raised in the consultation could be taken into consideration by Ofcom.
3. VLV notes particularly the WRC priority to find more spectrum for Mobile Data Services (MDS). We are gratified that the frequency bands being considered for MDS at this WRC are well beyond 1 GHz and that these will provide large amounts of spectrum to support the expansion of MDS in the future.
4. However, we make special note of the measures that the WRC may take in consideration of spectrum for broadcasting which has been under intense pressure from MDS in recent years and has contributed much of its UHF spectrum to support MDS in the UK. We are pleased that there is no specific agenda item at WRC 2019 that may affect the current allocation of the UHF band and no item relating to its re-purposing at least in the short term.
5. Whilst that may be the case at this WRC, VLV would not wish to see any attempt to change this situation; neither would we wish to see any resolution passed that would provide a basis for future changes to the use of the UHF to the detriment of Digital Terrestrial Television (DTT).
6. VLV is aware that the matter of DTT in the UHF has been tabled as a draft agenda item for WRC23 and VLV urges Ofcom to resist strongly any attempt to allow such an agenda item to place constraints on free to air broadcasters. We strongly support the recently published views of the Wider Spectrum Group (WSG) and the Radio Spectrum Policy Group (RSPG) in this regard.

7. VLV expects Ofcom to robustly protect DTT in the UK. While watching on-demand content via a broadband connection is growing in popularity, around 80% of viewing for most audiences remains via live broadcast TV, about half of which is via DTT. As well as being a major means of Free To Air (FTA) media consumption in the UK, DTT is also the basis of a major contribution to the UK economy. Moreover, as Digital UK note in their submission to Ofcom on preparations for WRC19, DTT is ‘..now the only major broadcast platform in the UK to be experiencing growth with nearly a million homes joining the platform in the last two years’. And as subscription TV has recently taken a small dip in popularity, a notable synergy is emerging between DTT and the use of Subscription Video on Demand (SVOD) services such as Netflix.
8. VLV has no specific views on the majority of the agenda items listed, but does recognise the needs of the communications industry to obtain suitable spectrum that will allow the various sectors to grow and support the UK economy.
9. While VLV recognises that spectrum can be released to enable the development of new technologies, we have some concerns over the intrusive nature of the internet and its expansion to include facilities for household appliances (The Internet of Things etc) that, if abused, can invade privacy without the public being aware. Therefore we would expect that the impact of Privacy and Security measures will guide the conditions of use applied by Ofcom when allocating spectrum to service providers. Unlicensed spectrum use is a concern in this regard.
10. VLV welcomes the observation made by Ofcom in its 2018 document *Public Service Broadcasting in the Digital Age* that ‘public service broadcasters will have uncontested access to DTT for at least the next ten years as the value to other users of the underlying spectrum has diminished’.