



JRC Response to Ofcom Consultation on Award of available spectrum: 412-414 MHz paired with 422-424 MHz

Overall View

- JRC welcomes the comprehensive nature of the consultation document and the arrangements made by Ofcom during the consultation period to explain the details of the document and clarify any misunderstandings.
- With the exception of the key point below, JRC considers that Ofcom has constructed the process in such a way as to optimise the likelihood of a successful outcome of the process, given the constraints on the spectrum.

Key concern

Spectrum Segmentation

1. JRC's one major concern is the offering of the spectrum in only one relatively large block of 2x2 MHz. Bearing in mind the two previously unsuccessful Dolphin Public Access Mobile Radio (PAMR) Networks, there is little justification for insisting that the spectrum must be offered in one block. This mitigates against competition, and makes it very difficult for innovative small companies to trial new methods of spectrum management which would best serve the long term interest of ensuring the most effective use of the spectrum in the national interest, and promote more efficient spectrum use.
2. JRC concurs with Ofcom's view that regional licences create boundary conditions which complicate the spectrum management process, and risks the spectrum being unoccupied in some geographic regions. However, a number of packages of national channels in differing sized blocks would still leave a viable amount for a national network (if anyone so wished), but create a number of smaller blocks for smaller innovative ventures.
3. It is noted that the general principle of facilitating multiple licensees has been followed in most spectrum awards – DECT Guard Bands, 3G auctions, 28 GHz auctions, 2G licenses, etc. Indeed, the one major competition where the outcome was restricted to one 'successful' bidder is the previous user of this spectrum, where Dolphin Telecommunications, twice having been given protection from competing private Tetra networks failed on both occasions.
4. JRC recommends that the spectrum be split into blocks such as 2x1.5MHz plus five blocks of 2x100kHz. Applicants would then be entitled to bid for up to three of the blocks.
5. If however Ofcom considers 2x2MHz the minimum necessary for a national network (a position JRC does not accept), then Ofcom could commit to offering any additional spectrum released from the Emergency Services block of 2x2MHz as a result of the decision on Firelink should not be aggregated with this 2x2MHz block, but offered separately.

Background

JRC is a wholly owned joint venture between the UK electricity and gas industries specifically created to manage the radio spectrum allocations for these industries used to support emergency and safety critical operations. JRC also represents gas and electricity interests to government on radio issues.

Adrian Grilli
Managing Director, JRC Ltd