



**JRC response to the  
Notice of proposals to make the  
Wireless Telegraphy  
(Licence Charges) (Amendment)  
Regulations 2015**

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## **KEY POINTS**

- JRC welcomes the opportunity to respond to this consultation.
- JRC is pleased that High Duty Cycle Network Relay Points licences have been made available. This spectrum may be suitable for applications including Smart Meters.
- JRC is pleased that additional 400 MHz UHF spectrum is being made available to Business Radio users. This spectrum may be suitable for resilient machine to machine (RM2M) Utility Operations systems, e.g. Smart Grids.
- JRC sees a potential knock-on issue if UHF Band I and UHF Band II become referred to as the UHF Band within the licensing process.

### **The Joint Radio Company Ltd (JRC) background:**

JRC Ltd 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 operational, safety and emergency communications.

JRC manages blocks of VHF and UHF spectrum for Private Business Radio applications, telemetry & tele-control services and network operations. JRC created and manages a national cellular plan for co-ordinating frequency assignments for a number of large radio networks in the UK.

The VHF and UHF frequency allocations managed by JRC support telecommunications networks to keep the electricity and gas industries in touch with their field engineers throughout the country. The networks provide comprehensive geographical coverage to support the installation, maintenance and repair of plant in all weather conditions on a 24 hour/365 days per year basis.

JRC's Scanning Telemetry Service is used by radio based System Control And Data Acquisition (SCADA) networks which control and monitor safety critical gas and electricity industry plant and equipment throughout the country. These networks provide resilient and reliable communications at all times to unmanned sites and plant in remote locations to maintain the integrity of the UK's energy generation, transmission and distribution.

JRC works with the Energy Networks Association's Future Energy Networks Groups assessing ICT implications of Smart Networks, Smart Grids & Smart Meters.

# Proposal question and JRC's response

*Question: We would welcome any comments on the drafting of the Proposed Regulations, and in particular whether they give effect to what Ofcom intends (as outlined in this document).*

a) JRC would like to highlight a potential issue if UHF Band I and UHF Band II are combined into a single UHF Band for licensing processing purposes.

The issue is that the national co-ordination arrangements for UHF Band I and UHF Band II are significantly different.

UHF Band II only needs to undertake national co-ordination with other Business Radio systems, and international co-ordination with the UK's four neighbours, whilst UHF Band I systems also need to be co-ordinated with Fylingdales.

This requires their being managed differently within Ofcom's licence processing software.

Indeed, with experienced users knowing the limitations, Ofcom's Business Radio licence application forms allow UHF Band I and UHF Band II to be specified.

JRC believes that combining the two UHF bands into a single UHF Band may therefore result in confusion when existing and potential licensees refer to Ofcom's wealth of licensing information sheets, etc. This will be especially so if the option to seek either UHF Band I spectrum or UHF Band II spectrum is removed from the licence application process.

Perhaps extending the current UHF Band II frequency range of 453.00625 MHz to 466.08750 MHz to become 450.000 MHz to 470.000 MHz within the revised Licence Charges Regulations 2015 document will be a simpler solution.

b) JRC also believes that using the term UHF Band for Business Radio UHF spectrum may also increase the confusion resulting from the mobile operators use of the term UHF Band for the [700 MHz] UHF Band.

c) If the UHF Band identifiers have to be changed, perhaps Ofcom will consider referring to the combined band as either the 400 MHz UHF Band or the Business Radio UHF Band.