



JRC Response to the Business Connectivity Market Review Competition in the provision of leased lines

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KEY POINTS

- JRC welcomes the opportunity to respond to this consultation.
- JRC acknowledges that there is a separate consultation document regarding the retail Traditional Interface (TI) services of which Ofcom is proposing to deregulate. JRC is responding to that consultation separately.
- JRC notes that Ofcom proposes not to require BT to provide access to its ducts infrastructure whereas the EU Civil Infrastructure Directive (CID) will introduce a requirement for all utility networks to meet reasonable requests for access to their infrastructure from public communications network operators for some services.
- JRC advises that some licensed utility operators responsible for managing critical national infrastructure are limited to only migrating to the Ethernet systems if they continue to require services supplied by BT. There is some concern regarding the power resilience of these services from end to end.
- JRC advises that electricity and gas distribution and transmission operators responsible for managing critical national infrastructure have plans to migrate in a timely manner to self-managed resilient radio-based or other systems. It is important that these CNI sectors are not exposed by early termination of VLB services, or as regulated industries themselves, are not subject to significant price increases for this service.
- JRC advises that in some cases, CNI operators are migrating to a radio based solution. The availability of suitable UHF Band channels is however becoming increasingly scarce. There will also be potential interference issues with using the 1.4 GHz Band after the supplemental downlink (SDL) systems in the adjacent band are rolled out.
- JRC advises that the ability of the utilities to migrate mission critical application off BT's VLB LL platform (where not being switched to private radio circuits) is directly dependent on BT's ability to provide the replacement EAD products. At the current roll-out rate of this service, one distribution network operator (DNO) forecasts that it would not be able to exit the VLB LL platform until 2025. It would therefore be desirable to seek assurances from BT that in exceptional cases, BT will continue to maintain mission critical VLB LL services subject to BT Openreach undertaking the provision of the EAD services.
- JRC observes that some customers have seen a significant deterioration in the availability of the BT VLB LL. In the past 3 years the average repair time for a BT VLB LL has increased 3 fold and is now greater than 24 hours. This decline in fault rectification has been most prominent in the past 12 months in that the average repair time has extended by 13 hours in 2014/15. Where there is a substantial delay in repairing a VLB LL circuit, an electricity operator is unable to clear or detect a related power system fault during such service outages: in these circumstances, the network operator may be compelled to operate a significant section of the network at risk for prolonged periods pending repair of the respective VLB LL circuit.
- JRC advises that the proposed EAD links may not be suitable as a replacement to very low bandwidth leased lines if they require mains powered junctions anywhere between the link ends or mains power is required at the remote end.

Consultation Questions

Question 8.1: Do you agree with the general remedies that we propose for BT in the wholesale TISBO and CISBO markets? If not, what alternative remedies would you propose and why?

JRC agrees that the proposed general remedies as shown in Table 8.1 should be applied to the 'Low bandwidth TISBO in the UK excluding the Hull area' during the whole 2016 to 2019 review period. In particular:

- Requirement to provide network access on reasonable request
- Requirement not to discriminate unduly
- Price control
- Requirement to notify changes to charges terms and conditions

Question 11.1: Do you agree with the PPC Direction that we propose for BT in the wholesale TISBO market? If not, what alternative would you propose and why?

JRC highlights that the ability of the utilities to migrate mission critical application off BT's VLB LL platform (where not being switched to private radio circuits) is directly dependent on BT's ability to provide the replacement EAD products. At the current run rate, one distribution network operator (DNO) forecasts that it would not be able to exit the VLB LL platform until 2025. It would therefore be desirable to seek assurances from BT that in exceptional cases, BT will continue to maintain mission critical VLB LL services subject to BT Openreach undertaking the provision of the EAD services.

JRC advises that some CNI operators are migrating to radio based solutions. The availability of suitable UHF spectrum for these applications is however becoming increasingly scarce. There will also be a further reduction in availability to resolve interference issues due to the introduction of supplemental downlink (SDL) systems in the adjacent band.

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 also represents gas and electricity interests to government on radio issues.

JRC and the utilities manage a significant number of satellite links for the critical national infrastructure and is keen for their protection and the on-going access to these bands.

JRC also manages blocks of VHF and UHF spectrum for Private Business Radio applications, telemetry & telecontrol 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 network assets and field engineers throughout the country. The networks provide comprehensive geographical coverage to support the operation, 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 networks.

JRC works with the Energy Networks Association's Future Energy Networks Groups assessing the ICT implications of Smart Networks, Smart Grids and Smart Meters, and participates in a number of international fora associated with utility radio operations.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Strategic review of satellite and space science use of spectrum CFI

To (Ofcom contact): business.review@ofcom.org.uk

Name of respondent: Adrian Grilli

Representing (self or organisation/s): The Joint Radio Company Ltd (JRC)

Address (if not received by email): as received by email

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why:

Nothing: Name/contact details/job title: *Nick Woollard, Project Manager*

Whole response: Organisation: *JRC*

Part of the response: If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)? JRC would prefer the contents of the annex to remain confidential until otherwise agreed.

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Adrian Grilli Signed (if hard copy)