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24 September 2010

Dear Ofgem

Due to the extensive nature of the Prospectus documentation and the limited time resource we have available, our comments are restricted to a general nature:

- Bearing in mind the Supplier-led rollout, the proposals look generally sensible and well thought-out.
- The tighter the roll-out timescale, the more restricted the telecommunications options will be. If radio based telecommunications are to be employed, unless the technology or provider already has access to spectrum, it is unlikely that spectrum can be made available by Ofcom on the timescales envisaged in the Prospectus. This may restrict the technology options at a time when smart grid technology is at a stage of rapid development.
- The security regime will need to be defined in some detail at an early stage as it will have implications for the design of the communications network. Security requirements can have an impact on the volume of data being conveyed on the network, and increase latency.
- Bearing in mind the unique nature of the UK market with a supplier-led rollout, more detail may be required on the way in which demand-side management will be implemented in order that the communications network can be appropriately designed. Critical parameters are likely to include items such as data rate, data path set up time, latency and broadcast mode capability.
- If radioteleswitch is to be decommissioned in 2014, it will be important to understand how the network-related elements of this service will be accommodated on a timely basis under the new DCC arrangements.
- The Prospectus refers to additional value-added services which might be offered over the Smart Meter Communications network. It would be helpful to understand how this sits within the EU Telecommunications Framework Directive. It would be helpful if any potential competition issues could be resolved before a detailed telecommunications specification is developed.

If you need any clarification, please contact me.

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