



JRC Response to the Notice of proposals to make The Wireless Telegraphy (Control of Interference from Apparatus) Regulations 2015

JRC Ltd
Dean Bradley House
52 Horseferry Road
London SW1P 2AF
United Kingdom

☎ +44 (0)20 7706 5199

✉ +44 (0)20 7222 0100

info@JRC.co.uk

www.JRC.co.uk/about

KEY POINTS

- JRC welcomes the opportunity to respond to this consultation.
- JRC is pleased to see that Ofcom acknowledges that utility operations are an important part of the UK's national infrastructure.
- JRC is pleased to see that Ofcom acknowledges that electromagnetic energy (and disturbance) generated by apparatus could compromise important communications systems.
- JRC supports the need for additional Regulations as an aid to managing undue interference quickly.

Additionally:

- JRC notes that the Proposed Regulations do not apply to fixed installations.
- JRC notes, however, that the Notice of Proposed Regulations states within Table 2:
 - 'Total cases (capable of being resolved under regs made under s54 i.e. existing and proposed regs)' is 100%.
- JRC notes that many of the related 13 apparatus examples shown in Table 3 may be considered as fixed installations, e.g. High Voltage Power Cables [and their insulators], Transformers, Control Equipment, and Domestic Electric Cables.
- JRC therefore suggests that, if all 13 examples are to be covered by the Proposed Regulations, Ofcom clarifies its definition of fixed installations, or amends the resolution percentage shown within Table 2 of the Notice of Proposed Regulations.
- JRC requests that Ofcom considers its issuing of Prohibition Notices in proportion to the general impact on the cessation of operation of an apparatus, e.g. a High Voltage Power Cable supplying 1000s of consumers with electricity.
- JRC highlights the risk of litigation should a Prohibition Notice be erroneously issued on a fixed installation apparatus.
- JRC suggests that Ofcom considers the impact of issuing a Prohibition Notice as an easy means of managing 'potential' sources of undue interference.
 - By way of example, in a major interference incident in May 2010, Ofcom engineers erroneously diagnosed a utility operations high voltage insulator at a 132kV sub-station as the source of undue interference to an adjacent Airwave radio site and requested the associated High Voltage Power Cables be disconnected to prove this. Fortunately, JRC and utility engineers were able to assist the investigation which identified the true cause of the interference was from a nearby source rather than the sub-station.

Consultation question and JRC's response

Do you agree that the Proposed Regulations correctly give effect to the policy proposals referred to, and to the other intentions set out, in this document?

It appears to JRC that the currently Proposed Regulations may not correctly give effect to the policy proposals.

Rationale:

- JRC notes that the Proposed Regulations do not apply to fixed installations.
- JRC notes, however, that the Notice of Proposed Regulations states within Table 2:
 - 'Total cases (capable of being resolved under regs made under s54 i.e. existing and proposed regs)' is 100%.
- JRC notes that many of the related 13 apparatus examples shown in Table 3 may be considered as fixed installations, e.g. High Voltage Power Cables [and their insulators], Transformers, Control Equipment, and Domestic Electric Cables.
- JRC therefore suggests that, if 100% of the 13 examples are to be covered by the Proposed Regulations, Ofcom clarifies its definition of fixed installations:
 - alternatively, Ofcom amends the resolution percentage shown within Table 2 of the Notice of Proposed Regulations so as to reflect the percentage of fixed installation examples.

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 energy 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.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: JRC Response to the Notice of proposals to make The Wireless Telegraphy (Control of Interference from Apparatus) Regulations 2015

To (Ofcom contact): Not defined [[Andrew.Cutting@ofcom.org.uk ?](mailto:Andrew.Cutting@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: *Joint Radio Company*
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)