

Consultation response form

Please complete this form in full and return to ALF2021@ofcom.org.uk.

Consultation title	Proposal to apply Administered Incentive Pricing for the 412–414 MHz, paired with 422–424 MHz, frequency bands
Full name	Julian Stafford
Contact phone number	02077065199
Representing (delete as appropriate)	Organisation
Organisation name	Joint Radio Company Limited
Email address	Julian.stafford@jrc.co.uk

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	Part of the response. See Section 5.
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
----------	---------------

<p>Question 1: Do you agree with our provisional conclusion that there is likely to be excess demand for the 412MHz band in future and that therefore an AIP fee is appropriate? Please provide any evidence to support your position.</p>	<p>Confidential: N JRC considers the AIP process as a logical method of setting the annual fee for the 412 / 422 MHz spectrum acknowledging that there is likely to be excess demand for this spectrum band.</p>
<p>Question 2: Do you agree with our provisional conclusion that UK-wide exclusive Business Radio is the highest value alternative use for the 412MHz band? Please provide any evidence to support your position.</p>	<p>Confidential: N JRC notes Ofcom’s approach to aligning the AIP pricing of the 412 MHz – 414 MHz (paired with 422-424 MHz) band in its current configuration, to that of Business Radio and welcomes the opening of this spectrum as a consequence of this approach to Business Radio solutions.</p>
<p>Question 3: Do you agree with our provisional conclusion to set the annual licence fee for 412 MHz equal to the Business Radio UK-wide fee for high usage bands? Please provide any evidence to support your position.</p>	<p>Confidential: N JRC agrees with the proposed AIP pricing. The proposed AIP pricing reflects the Area Defined spectrum access costs for the adjacent UHF1/2 bands channels and the High Band channels.</p>
<p>Question 4: Do you agree with our provisional conclusion that fees set based on our estimate of market value will best meet our statutory duties?</p>	<p>Confidential: N Yes, JRC agrees that Ofcom’s Statutory duties in terms of spectrum pricing are most logically satisfied by the process outlined.</p>
<p>Question 5: Are there any other comments that you wish to make in respect of the proposals that we make in this consultation?</p>	<p>Confidential: Partly - text between two Asterix is confidential JRC agrees that the full fee should be payable from 5 October 2021. JRC also agrees that the annual fee should be payable in 10 monthly instalments.</p> <ul style="list-style-type: none"> • Spectrum Access for Smart Grids <p>*Ofcom are currently undertaking a Strategic Review to consider the need for dedicated spectrum access (2 x3 MHz) in the sub 1GHz band to facilitate a UK wide smart grid solution to enable the Net Zero agenda. As such, JRC is interested to explore with Ofcom whether a similar approach will be taken to assess the ongoing fees payable by users of similar adjacent spectrum in the band 410-412 paired with 420-422 MHz. (and potentially</p>

380-395 MHz). Specifically, JRC understands that access to suitable spectrum in the UK for a utility smart grid will potentially only be possible if complex re-engineering is undertaken of existing spectrum allocations. If such a re-engineering exercise were to be considered by Ofcom then the spectrum allocation considered within this consultation could form a key component of this. *