

ERC Recommendation 70-03 - Draft annex 2

Response by Joint Radio Company Ltd

The Joint Radio Company (JRC) welcomes the opportunity to respond to this consultation. In doing so, we recognise these are complex issues normally outside the main focus of JRC, but in this instance utilities do make current use of the band 870-876 MHz in the UK, and we are exploring opportunities for future deployments to complement systems operating in licensed spectrum.

Thus, JRC is concerned about the changes being proposed to ERC Recommendation 70-03 where they might affect existing and future systems conforming to the Wi-SUN principle.

We do not object to the intention to extend the GSM-R spectrum to accommodate future deployment of LTE-R systems, but we would wish to see legacy systems operating in the band 870-874 MHz continue to be able to be used; and also use the band for future applications to extend utility control into areas which might otherwise be difficult or disproportionately expensive to monitor and control. Ultimately, the cost of deployment of utility control systems has to be borne by electricity and gas consumers, and utilities wish to avoid unnecessary costs which would be to the detriment of energy consumers.

JRC observes that networked 'Short Range Devices' (SRDs) have already been rolled out under the conditions set out in the previous version of ERC Rec 70-03. In these instances, control by a 'Network Access Point' (NAP) was not necessary below 873MHz.

We are concerned that the operation of some technologies might be ruled out by an overzealous interpretation of the meaning of 'under the control of a NAP'; gold-plating the interpretation is always a risk in implementing regulations.

We would be content to see NAP rules applied above 873 MHz (or 874 MHz as appropriate) to protect railways systems, but request that spectrum in the band 870-873 (or 874) MHz can continue under the present regime to facilitate maximum flexibility in exploiting the characteristics of this SRD band.

Background

The Joint Radio Company Ltd (JRC) 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 & telecontrol services and network operations.

JRC supports the European Utility Telecommunications Council (EUTC) Radio Spectrum Group and participates in other global utility telecom organisations. JRC participates in European Telecommunications Standards Institute (ETSI) working groups developing new radio standards, and European telecommunications regulatory groups and workshops.

JRC also manages microwave fixed link and satellite licences on behalf of the utility sector.

JRC works with the Energy Networks Association's Future Energy Networks Groups assessing ICT implications of Smart Networks, Smart Grids & Smart Meters, is an active member of the Energy Networks Association Strategic Telecoms Group and is an acknowledged knowledge source for cyber-security in respect of radio networks.