

Response to Consultation and Draft Decision on the Release of the 400 MHz Sub-band

Response

The Joint Radio Company (JRC) welcomes the opportunity to respond to this consultation. JRC supports the actions of the Commission for Communications Regulation (ComReg) to progress the release of the of 400 MHz spectrum under consideration for ‘Smart Grid’ developments in Ireland. The principle focus of this response is the change proposed to the spectrum available to the award process, in particular the reduction of the lot B award from 2 x 2.5 MHz to 2 x 1 MHz with 2 x 1.5 MHz being reserved for potential Broadband - Public Protection and Disaster Relief (BB-PPDR) purposes in the future. From a procedural perspective it seems strange to intervene at this very late stage in the regulatory process with a proposal that is potentially detrimental to the key objectives of this award, i.e. facilitate spectrum to support ‘Smart Grid.’ Furthermore, the reservation of spectrum in this frequency range for BB-PPDR purposes whilst now contemplated within the revised decision ECC 16/02 it is at odds with the emphasis that is being placed across Europe on the 700 MHz band.

Detrimental Impact of Proposed Changes to the Lot B Award

The reduction of the Lot B award to 2 x 1 MHz of spectrum forecloses the opportunity for this spectrum to be deployed alongside Lot A spectrum utilising the minimum LTE standard channel configuration of 2 x 1.4 MHz and in so doing would prevent the Smart Grid network from potentially utilising 2 x 5 MHz channels in the radio design. This reduces flexibility in terms of the network capability and how it might be optimised and has implications for the ultimate configuration of the network, including the number of sites and quantity of equipment that will need to be deployed with the resulting negative impact on system cost and complexity.

Potential Implications of the Changes to the Lot B Award on Licence Obligations

Considering the proposed changes to the Lot B award there are potential detrimental implications to the terms of the spectrum award, in particular;

- Roll-out term obligation – whilst we welcome the increase to 7 years for the roll-out obligation to be satisfied, the reduction in flexibility resulting from the proposed changes to the Lot B award may cause added complexity and hence delay and we encourage ComReg to revisit this target.
- Minimum Licence Term – we continue to encourage ComReg to increase the minimum licence term to at least 20 Years and ideally 25 Years. With Smart Grid capability and applications in their infancy and the acknowledgment that Utilities will be required to profoundly change their operating model to implement and harness their benefits it is imperative that the sector has long term certainty over spectrum access to realise the benefits of the Investments and Industry changes necessary. Noting this need for long term security of access to spectrum it is unfortunate that the Lot B award has been changed in such a manner to render it unsuitable to offer flexibility to the Smart Grid developments targeted to the Lot A award.

Overall, we continue to support the actions of ComReg to facilitate spectrum access for Smart Grid development in Ireland, subject to some minor adjustments to the terms of the award and the licences as noted above.



Background

Joint Radio Company 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 & telecontrol services and network operations. JRC created and manages a national cellular plan for coordinating frequency assignments for several 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 field engineers and remote assets. These networks provide comprehensive geographical coverage to support installation, maintenance, operation and repair of plant in all weather conditions on 24 hour/365 days per year basis.

JRC's Scanning Telemetry Service is used by radio based Supervisory 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 also manages microwave fixed link and satellite licences on behalf of the utility sector.

JRC supports the European Utility Telecommunications Council's 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 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.