



Response to consultation on the RSPG's Work Programme for 2020 and beyond

Itron is a global organization providing services to utilities around the world connecting smart meters and offering smart grid services to allow electricity networks to be operated in a more efficient way. Itron's global turnover is in excess of US\$1 billion. Itron, is dedicated to creating a more resourceful world. Together with our customers, we work to improve the quality of life, ensure the safety and promote the well-being of people everywhere.

Itron is delighted to respond to this consultation and applauds the sensible and farsighted rationale on which the Work Programme is based.

In particular, we agree that, clearly, as spectrum is a constrained resource having ever greater demands placed upon it, a larger number and more effective sharing mechanisms need to be determined in order for the benefits of radio systems to be maximized.

Climate change is also a critical topic faced by the whole of humanity and all resources possible should be mobilized to help to counter the most harmful. Energy networks have a large role to play in combatting climate change, both by increasing the efficiency by which energy networks – electricity and gas – are managed, and by allowing renewable energy sources to connect to national and international networks. Management of the nodes in the lowest levels of these networks is underdeveloped in European networks and comprise many millions of nodes.

A range of technologies exist to provide better visibility and management at these levels, many of which are based licence-exempt or Short Range device technologies. Spectrum in the 902-928MHz band is used on all continents around the world to support these applications. This spectrum offers a good compromise between range and data capacity. The spectrum is available in the majority of EU countries after a great deal of work that has been carried out by CEPT over the past ten years, and was the subject of a recent EC Implementing Decision (EU/1538/18). This will form the core of an important class of applications that are already heavily used in other parts of the world. Access to this spectrum should be closely guarded until it becomes established over the next ten years.

We trust that these comments will be received in the spirit constructive feedback and would be happy to discuss any of them in more detail.

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