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TETRA and Critical Communications Association response to RSPG spectrum review consultation

1 Foreword

The TETRA + Critical Communications Association was established in 1994 under the name TETRA MoU Association to promote the ETSI TETRA standard and to enable effective cooperation of users and manufacturers of TETRA products to build an open professional mobile radio marketplace by ensuring interoperability of products. Recently the Association has extended its scope beyond the TETRA standard to facilitate open broadband standards and solutions for mission critical professional mobile radio users.

TCCA welcomes the opportunity to express its views related to the planned inventory and review of European spectrum use. Below we are addressing some issues we feel important from the viewpoint of development of professional mobile radio services.

2 Assessing the demand

We consider it crucially important to involve all stakeholders in the process to get a realistic overall picture of the foreseen demand for new frequencies. This may not be any problem with commercial mobile broadband services, as a number of quantitative reports and market forecasts have been published and will likely be published on a regular basis.

Consolidating reliable demand data on various other wireless applications is significantly more challenging, and consultation of quite a large number of stakeholders is probably the best, if not the only, way to create the picture. We observe that the list of suggested stakeholders in the sectors of Critical Infrastructures and PPDR in the draft RSPG Opinion is not extensive and, knowing that both those sectors have stated needs for additional radio spectrum to extend their service capabilities, we offer some organisations for consideration.

Critical Infrastructures (energy sector, rail transport etc):

- Utilities Telecom Council (UTC) as a global organisation
- European Utilities Telecom Council (EUTC) as a European organisation
- UIC, International Union of Railways

Public Protection and Disaster Relief (PPDR):

- The Law Enforcement Working Party (LEWP) of the Council of JHA Ministers
- Public Safety Communication –Europe (PSC-E)
- Federation of the European Union Fire Officer Associations (FEU)

Also the TETRA + Critical Communications Association is available as an information provider, and reports forwarder, in matters concerning professional mobile radio services if considered appropriate.

3 Analysis of socio-economic costs and benefits

The draft RSPG Opinion quite correctly highlights the importance of due comparison of socio-economic cost and benefits as part of the spectrum demand and supply analysis – and raises some concerns and perceived difficulties in Appendix 1 especially with the measurement of social benefits. We agree with the draft Opinion that this can be difficult.

However, we see that evaluation of the social benefits is crucially important especially in the context of services whose main contribution to the society is normally not calculated on financial scale and we see an urgent need for some methodology to cover this deficit. We understand that the RSPG is in a process of producing a joint RSPG/BEREC report on the economic and social value of spectrum, but we also understood that this report would cover only the Electronic Communication Services, i.e. commercial wireless services, and thus would not provide assistance to evaluation of various other radio applications.

We suggest that the methods of estimation of the social and economic values in the spectrum supply/demand analysis should be improved with e.g. elaboration of specific reports addressing the other domains of spectrum usage such as Critical Infrastructures, PPDR and Transport. This could perhaps be done in consultation with the relevant stakeholders with whom a dialogue will be established in any case for the spectrum needs assessment task.

4 Inventory of current supply

In some cases the inventory might be quite simple, for example PPDR today operates within a 2 x 5 MHz harmonised band between 380 and 400 MHz as per ECC/DEC(08)05, using 12.5 or 25 kHz narrowband radio channels. This band is typically fully occupied and in some places congested.

However, for the purposes of fulfilling the new high speed data needs of PPDR (or critical infrastructures such as energy distribution) the size of currently used own band is not showing the full picture. The challenge with PPDR is that PPDR needs new allocation for broadband and high speed data services – as already described e.g. in the ToR of ECC/CEPT PT FM49. This means that the inventory process will be really beneficial for PPDR frequency work only when the process gives a full European wide picture of all potential opportunities to re-organise some (2 x 10 MHz according to ETSI) UHF spectrum – for cost reasons below 1 GHz - to meet the BB PPDR needs.

The draft RSPG Opinion quite correctly raises concern about the results of disparate inventories in and by member states with regard to obtaining a full European wide picture of harmonisation opportunities. For a low volume business segment like PPDR the harmonisation is of crucial importance for reasons of economy (and for operational reasons of course equally important to the users). This is why we strongly encourage coordinated European wide conclusions to be consolidated as the final result of the inventory.

5 Conclusions

The TCCA agrees with the importance of harmonisation of frequencies and detail level inventory of spectrum usage to allow Europe to respond effectively to the emerging mobile communication needs, and would like to make the following recommendations:

- The future traffic and spectrum needs of all spectrum user groups should be clarified through extensive stakeholder consultation, and we have offered names of some organisations for inclusion
- We suggest that the methods of estimation of the social and economic values in the spectrum supply/demand analysis should be improved with e.g. elaboration of specific reports addressing other domains of spectrum usage than ECS, such as Critical Infrastructures, PPDR and Transport. This could perhaps be done in consultation with the relevant stakeholders.
- The results of the inventory will help harmonisation much better when the results are duly consolidated on European level and we suggest that this should be arranged as part of the process.