CER
The Voice of European Railways

Position Paper
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Public consultation on the draft RSPG Opinion on the Spectrum Aspects of the Internet-of-things (IoT) including M2M

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Reference document

RADIO SPECTRUM POLICY GROUP: [Draft] Opinion for public consultation on a Spectrum Roadmap for IoT (Draft Opinion on the Spectrum Aspects of the Internet-of-things (IoT) including M2M)
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Introduction

The Community of European Railway and Infrastructure Companies (CER) welcomes the opportunity to provide comments to the Radio Spectrum Policy Group (RSPG) on the draft Opinion on the Spectrum Aspects of the Internet-of-things (IoT) including M2M.
CER is the leading European railway association bringing together more than 70 European railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies, thus representing the entire railway system.
Spectrum is a critical issue for the fulfillment of the railway mission. Communication services conveyed by the GSM-R network contribute to the safety and proper functioning of the circulation of trains, and any malfunction may result in critical operational situation or even safety relevant operational conditions. The spectrum allocated to the railways are fully exploited on dense nationwide networks and enable the mobility of around 400 billion passenger-kilometers per year in the European Union on more than 200 000 km of track[1].

CER comments on RSPG Opinion on IoT

In point 4 of the Opinion, it is encouraged to develop a common European focus on the bands listed in the roadmap because currently these bands are only available on a national basis. CER notes that among those bands are listed the "870-876 MHz and 915-921 MHz bands, on a national basis". CER wants to emphasize that the band 873-876 MHz paired with 918-921 MHz are also designated for the extension of GSM-R networks, on a national basis, as stated in ECC Decisions ECC/DEC(04)06 and ECC/DEC(02)05.
These bands are also identified as best possible candidate bands for the next generation railway mobile communication system, the successor of GSM-R which should become available by 2022. RSPG Draft Opinion on ITS also describe these bands as one of the options listed, draft ETSI System Requirement Document TR 103 333 which recently underwent public consultation target these bands also as prefered solution for that purpose.

[1] UIC Railway Statistics 2015

The issue of spectrum for the GSM-R network evolution is a complex one, and until a solution has been found that allows the fulfillment of the national requirements as also the requirements of the European Interoperability of this critical communications service. CER is of the opinion that no signal should be given at the European level as to the potential availability of the bands 873-876 MHz and 918-921 MHz for IoT. This caution is all the more justified as the RSPG does currently not foresee a scarcity of spectrum for IoT, subject to regular review of the evolution of spectrum demand.
Therefore CER is of the opinion that the bands 873-876 MHz and 918-921 MHz should not be addressed in the RSPG IoT roadmap, and **respectfully suggests to replace 870-876 and 915-921 MHz by 870-873 MHz and 915-918 MHz in the roadmap diagram.**

CER comments on the Annex of RSPG Opinion

In section 5a of the annex, the RSPG opinion considers opportunities to make available portions of the bands 870-876 MHz and 915-921 MHz [for IoT]. In addition to the general comment made above on the key potential of the bands 873-876 MHz and 918-921 MHz for the evolution of GSM-R networks, CER emphasizes that the compatibility with railway mobile communication systems (GSM-R and its successor) of increased implementation of SRD in adjacent bands, remains a key issue which has to be studied further, and for instance has not been addressed in the draft ECC Report 246 which underwent recently public consultation.
Therefore CER suggests to add in the end of section 5a. **"Consideration of such implementation at national level should also take into account the options for GSM-R networks evolution as highlighted in the opinion of RSPG on ITS, especially the potential use of the 873-876 MHz and 918-921 MHz bands for that purpose, and should at any rates ensure the compatibility with transmissions in the adjacent GSM-R bands".**

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 80% of the rail freight business and about 96% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us via Twitter at @CER_railways.

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