Dear RSPG Secretariat,

ArgoNET welcomes the opportunity to comment on the RSPG public consultation on the Draft Opinion on the Spectrum Aspects of the Internet-of-things (IoT) including M2M.

ArgoNET is a telecom service provider in Austria operating dedicated wireless M2M communication networks in the 450MHz band. Our primary focus is to serve utilities and other vertical industries with reliable and secure communication services for business critical IoT applications. While our existing networks are based on 3G CDMA technology future deployments will be using 4G LTE technologies including eMTC/LTE-M and NB-IoT.

Please find below our input to the consultation RSPG16-045:

- Page 3: As the 450MHz band is standardized for and used with 3GPP and 3GPP2 technologies it should be listed as an example band for mobile network technologies in the figure on top of the page.
- Page 3: ArgoNET supports recommendation #7 and would like to ask for special attention to the efforts currently undertaken within CEPT/ECC FM 54 aiming at the introduction of LTE in the 450 MHz band.
- Page 4: ArgoNET does see a trend for “smart meter” applications in the electricity space being considered as “critical communication” by many utilities already today. This is mainly driven by integration of smart grid functionality into the smart meter units (e.g. power quality, demand response, prosumer, etc).
- Page 5: Frequencies for the implementation of professional mobile radio (PMR) networks are typically also being used for public access mobile radio (PAMR) applications. PAMR networks support the sharing of physical networks by logically separated PMR user groups and applications, thus providing higher spectral efficiency as compared to dedicated PMR networks.
- Page 7: Article 6 should mention both PMR and PAMR networks.
- Page 7: Some of the applications listed in the last paragraph (e.g. smart metering, ITS, mobile health) are equally addressed by the use of wideband and broadband PMR or PAMR networks today, which can typically provide an even higher service level than public mobile networks.
- Page 8: There are PAMR networks used for critical communication services in Europe today (e.g. Netherlands, Germany, Hungary, Austria) which should be reflected in section b.
- Page 8: To avoid confusion with the license exempt “433 MHz” band listed on page 3 it would make sense to use CEPT/ECC definitions of “410-430 MHz” and “450-470 MHz” for PMR/PAMR spectrum ranges instead of “400 MHz” listed in section b.
- Page 8: current work in CEPT/ECC FM 54 is addressing the introduction of new 3GPP based wideband and broadband technologies like NB-IoT and LTE with channel bandwidth of 200 kHz, 1.4 MHz, 3 MHz and 5 MHz. This should be reflected in the next to last paragraph and clearly linked to PMR and PAMR use cases.

Due to its technical and economic advantages and recent developments in 3GPP standardization the 450MHz band will most likely become the mainstream frequency band for critical IoT communication in Europe over the coming years. Given this potential ArgoNET would welcome if existing usage and ongoing development in this frequency band as well as current activities in CEPT relating to future use of the 450MHz band for IoT applications can be addressed in the RPSG spectrum roadmap.

Thank you for taking our comments into consideration.

Best Regards

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ArgoNET GmbH