



Vodafone response to Ofcom consultation:

“Authorising higher duty cycle Network Relay Points 870 to 873 MHz”

VODAFONE RESPONSE

Vodafone welcomes Ofcom's continued efforts to release the spectrum from 870-876MHz in a manner suitable for M2M applications. Although Vodafone is of the view that scale wide area networking for M2M/IoT is best served by licensed cellular spectrum (for more information see Vodafone response to Ofcom's recent Call for Inputs on IoT), we recognise that certain applications may wish to make use of unlicensed (or in this case lightly licensed) spectrum.

Vodafone recognises the tension between awaiting full international harmonisation, and not creating a market barrier. We believe Ofcom's proposed approach of issuing licences to use higher duty cycles is pragmatic, allowing the situation to be unravelled should harmonisation not progress in the manner expected. We also agree that licensing on a network rather than individual node basis is sensible.

Vodafone acknowledges that CEPT has undertaken thorough investigations, but we are keen to ensure that any threats to primary services in adjacent bands are sufficiently mitigated. In our earlier responses to consultations¹ on this band, Vodafone identified that the CEPT studies on compatibility with public cellular systems do not include the case in which a Network Relay Point (NRP) with 10% duty-cycle is co-sited within close proximity to a cellular base station receiver, hence the performance degradation that the NRP could introduce on a public cellular network (base station receive) has not been quantified. Our interpretation of the draft ECC report² is that this remains the case.

Vodafone has an ongoing programme to carry out testing of technology to be used in the band and believes that the associated harmonised standard should specify tighter restrictions on spurious emissions than are currently contained in EN 300 220 for devices to be co-sited on mobile masts, and this should be a requirement of the deployment of such devices under a light licensing regime. Pending further analysis Vodafone would agree with Ofcom that NRPs should be allowed on a licensed basis, but that all requests to operate NRPs should be supported with evidence that interference and performance degradation to both voice and data of the public cellular network will be negligible (this could be in the form of assurances around the location of the NRPs to be deployed).

**Vodafone UK
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¹ See for example <http://stakeholders.ofcom.org.uk/binaries/consultations/short-range-devices/responses/Vodafone.pdf>

² <http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=1&cad=rja&uact=8&ved=0C CIQFjAA&url=http%3A%2F%2Fwww.cept.org%2Ffiles%2F1051%2FTools%2520and%2520Services%2FPublic%2520Consultations%2F2013%2FDraft%2520ECC%2520Report%2520200.docx&ei=XxDJU-m1KvHa0QXFgYHwAQ&usq=AFQjCNGC6dLnBoJaAotpcSqjPRh196Big&bvm=bv.71198958,d.d2k>