

The European Utilities Telecoms Council (EUTC), representing European electricity and gas generation, transmission and distribution companies welcomes the opportunity to comment on Ofcom's preparations for the World Radiocommunications Conference 2023 (WRC-23).

## **Summary**

In view of the Climate Emergency, the need to reduce emissions of carbon dioxide (CO<sub>2</sub>) on a global scale, the severe droughts in many parts of the world and domestic UK climate ambitions, EUTC believes that Ofcom should be urgently calling for an item addressing the need to identify spectrum for 'utility radiocommunications systems' to be added to the draft agenda for the subsequent World Radiocommunications Conference 2027 (WRC-27) to follow up on a report of the same name being prepared in Working Party 5A (ITU-R WP5A).

# **Background**

Item 10 of the Agenda requires WRC-23:

"to recommend to the Council items for inclusion in the agenda for the next WRC, and items for the preliminary agenda of future conferences, in accordance with Article 7 of the Convention and Resolution 804 (Rev.WRC-19)."

The International Telecommunication Union (ITU) is the United Nations' (UN) specialized agency for information and communication technologies – ICTs.

On 12 September 2022, the UN Secretary-General, António Guterres said in his remarks during a field visit to Pakistan to see for himself the devasting effects of recent floods:

"It is difficult not to feel deeply moved when we hear such a detailed description of tragedy, of the loss of life, of destruction, the loss of property, the loss of livelihoods.

According to the scientific community, we need to reduce emissions by 45% by 2030. I'm not talking about the end of the century, I'm not talking about 2050, I am talking about now. Now is the time to reduce emissions.

But the fact is that we are already living in a world where climate change is acting in such a devastating way. So, there must be massive support to what usually is called adaptation, which means to build resilient infrastructure and to support resilient communities and to create conditions for those that are in the hotspots of climate change."

Utilities are at the forefront of both reduction of carbon dioxide emissions and mitigating the damaging effects of climate change. This is recognized not only through the ITU-R WP5A work, but also through Ofcom's own utility spectrum project due to report later this year.

EUTC is collaborating with other international utility telecoms associations to promote recognition of the need for access to spectrum for utility operations within the International Telecommuication Union (ITU) Radio Sector (ITU-R) Study Group 5 (WP5A) to develop the report on utility spectrum needs<sup>1</sup>. This work is in parallel with a Report ITU-R SM.2351.1 on Smart Grid Utility Management Systems.<sup>2</sup>

In the light of UN Secretary-General António Guterres statements about the urgency of the task, it would be perverse not to include the topic in issues to be debated at WRC-27. If this subject is left until WRC-27 to be placed on the Agenda of WRC-31, it will have taken almost a decade to raise the profile of this important aspect of spectrum policy. As a UN Body, ITU should most definitely be elevating the status of debate on the role of spectrum policy in supporting carbon reduction and mitigating the effects of climate change. If the UK raises this issue, it would be a fitting follow-up to COP26 hosted in the UK last year.

Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?

### **EUTC Response:**

In the same way as other key sectors are recognized in the Radio Regulations, for example Public Protection and Disaster Relief (PPDR), Utility Operations should receive similar recognition because of the potential for enhanced utility operations to play a major role in supporting resilient communities, the reduction of global carbon dioxide emissions and mitigating some of the extreme effects of climate change.

The UK should therefore follow up its hosting of the 2021 United Nations Climate Change Conference by proposing that a new service category be added to the radio regulations to recognize spectrum used for utility operations to reflect the UK's own focus on climate action.

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Annex 18 of Report on the twenty seventh meeting of Working Party 5A <a href="https://www.itu.int/md/R19-WP5A-C-0597/en">https://www.itu.int/md/R19-WP5A-C-0597/en</a> https://www.itu.int/dms pub/itu-r/opb/rep/R-REP-SM.2351-1-2016-PDF-E.pdf

# Access to radio spectrum

Utilities must have control over their operational telecoms networks if they are to deliver the services required by their communities. It is essential for them to be guaranteed access to a small amount of dedicated radio spectrum for these operations, especially to enhance resilience.

The amount of spectrum required by utilities to support their operations is less than 1% of that identified for public mobile operators in most countries, and therefore would have no detrimental impact on public mobile broadband services.

#### **EUTC Spectrum Proposal**

Within Europe, multiple small allocations within harmonised bands:

LESS INTENSE APPLICATIONS

 VHF spectrum (50-200 MHz) for resilient voice comms & distribution automation for rural and remote areas. [2 x 1 MHz]

#### ANCHOR BAND

 UHF spectrum (400 MHz bands) for SCADA, automation, smart grids and smart meters. [2 x 3 MHz]

MORE DENSE APPLICATIONS

- Lightly regulated or licence-exempt shared spectrum for smart meters and mesh networks. (870-876 MHz)
- Mid-Band Region (1-5 GHz) for more data intensive smart grid, security and point-to-multipoint applications. [10 MHz]

**FOUNDATION BANDS** 

- Public microwave bands (1500 MHz 58 GHz) for access to utilities' core fibre networks/strategic resilient back-haul.
- Public satellite bands to complement terrestrial services for particular applications.

# The European Utilities Telecom Council (EUTC)

The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.

This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.

EUTC includes a number of UK utilities and industrial partners in the UK.

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