



Spectrum for the police service of Northern Ireland



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BT's response to Ofcom consultation
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BT Group



Introduction

BT¹ welcomes this opportunity to provide its views on Ofcom's proposals² to make 700 MHz and 800/900 MHz spectrum available for the Police Service of Northern Ireland. BT has particular interest in the proposals as EE holds a licence for adjacent spectrum in the 700 MHz band.

We note that the premise of Ofcom's proposals is that a separate network is required for the requirements of the emergency services in Northern Ireland. This is different to the approach in the rest of the UK, where the Emergency Services Network is to be supported in the same spectrum as a public mobile network. Our response to this consultation has not directly addressed the merits of separate or shared networks/spectrum as we understand that is not within the scope of this consultation. However we have identified some important related considerations, such as if the licence were granted as Ofcom proposes, what non-technical licence conditions should apply?

Below we provide responses to the specific consultation questions that Ofcom has posed.

Responses to the questions

Question 1:

Do you agree with our provisional view that the spectrum 733 to 736 MHz paired with 788 to 791 MHz should be made available to and authorised for use by the PSNI in Northern Ireland? If you disagree with our view and consider there is a higher value use, please provide details of this alternative use, particularly considering the issue of the risk of interference from SDL.

The potential for use of these bands for Public Protection and Disaster Relief (PPDR) has previously been discussed in the CEPT. Various compatibility studies between 700 MHz PPDR and adjacent band cellular mobile networks public were previously conducted within the CEPT, albeit in the context of 4G technology: for example, as described in the ECC Reports 218³ and Report 239⁴. Those studies seem reasonably consistent with what Ofcom has set out in this present consultation.

We note, and tend to agree with, Ofcom's view that although there is risk of interference in some scenarios, compatibility between 700 MHz SDL use in a public mobile network and PPDR should be possible but might require some mitigation measures, such as additional filtering on PPDR base stations.

On the basis that Ofcom will not require any specific mitigation measures to be adopted by 700 MHz SDL networks or any constraints to be imposed on holders of the 700 MHz auction licences, we have no objection to Ofcom's proposals from a viewpoint of technical compatibility with adjacent services.

Please refer also to our response to Question 3.

Question 2:

Do you agree with our provisional view that the spectrum 876 to 880 MHz paired with 921 to 925 MHz should be made available to and authorised for use by the PNSI in Northern Ireland? If you disagree and consider there is a higher value use, please provide details of this alternative use, particularly considering the small market potential of this spectrum.

We have no comments in this proposal.

¹ BT, including our mobile subsidiary EE Ltd.

² https://www.ofcom.org.uk/_data/assets/pdf_file/0026/243719/consultation-ni-spectrum-police-service.pdf

³ See ECC Report 218 <https://docdb.cept.org/download/1164> Option D.

⁴ See ECC Report 239 <https://docdb.cept.org/download/1220>

Question 3:

Do you have any other comments on the proposals?

In general we consider the sub-1GHz spectrum bands to be of high value for mobile services, for example as revealed in past auctions, particularly for paired sub-1GHz spectrum. In the case of the spectrum that Ofcom proposes to make available to the PSNI in the 700 MHz band, interest in the future possible use for public mobile networks should not be ruled out, although the possible limitations of coexistence with 700 MHz SDL we agree could be a hurdle. For the 800/900 MHz we understand that this spectrum is identified for railways use in many countries.

We note that Ofcom has not addressed the question of fees for use of the spectrum. Also, it is unknown whether it is intended that the spectrum would be tradable in case a higher value use is later identified or whether, in this instance, the licence could be revoked on spectrum management grounds with a certain notice period so it could be returned to Ofcom to be re-assigned.

Non-technical licence conditions such as annual fees, the duration and any “use it or lose it” conditions are important considerations, as well as whether there will be any obligation to share the spectrum. For example, will Ofcom offer Local Access licences as it does in spectrum licenced to national mobile operators?

If the spectrum were provided at administrative cost-based charges and as an indefinite licence, there would be less incentive to bring it in to use than if the licence had to be used within a certain period.

The above issues should be considered at the time of Ofcom’s Statement on the proposals, when it might have better information about the level of demand and the opportunity cost of the spectrum following the present consultation exercise.




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