Consultation response form

Your response

Question	Your response
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.	*Is this response confidential? – N* We agree that spectrum should be made available for critical services, including but not limited to, the PSNI. However, we note that you are proposing to make 2 × 3 MHz of the 700 MHz band (specifically 733 to 736 MHz paired with 788 to 791 MHz) **and** 2 x 4 MHz in the 800 / 900 MHz bands (specifically 876 to 880 MHz paired with 921 to 925 MHz) available for use by the Police Service of Northern Ireland. This is to support approximately 20000 users, mostly Emergency Services. NIE Networks are also a critical service providing the electricity supplies to all within NI including the PSNI. If we do not have electricity the PSNI will not be able to operate effectively. Our critical Operational Telecommunications infrastructure provides connectivity from Control Centres to and between generation and sub-stations. This infrastructure is used to monitor the state of the electricity grid and to reduce the number of customer interruptions and length of time customers are without supply. The electricity system is undergoing a transformation as we move away from large centralised power stations to a distributed generation model enabling the transition to "net zero". The demand for electricity is also increasing as electric heating and electric vehicle numbers increase. This transformation to this more dynamic model can only happen with more control and system information. This requires critical operational telecommunications. The existing communications arrangements do not have the

	capacity, reach or scale needed to connect all the devices associated with the transformation to a DSO These critical communications can only be met cost efficiently by use of suitable radio-based devices. Public Networks do not meet the availability and reliability requirements required, particularly under power fail conditions. NIE Networks anticipate that the 'Net Zero' objectives of Government will require connection to around 50000 end points for control and information which we note is 2.5 times the proposed number of users on the PSNI network. Additional spectrum needs to be made available to the critical Utility sector. This is demonstrated by developments across Europe where additional spectrum is already being made available to facilitate this demand. For example, in the Republic of Ireland the Communications Regulator (ComReg) acknowledged the need for additional spectrum to be made available to facilitate Smart Grid developments. Access to 2 x 4.5 MHz of spectrum in the 400 MHz range was awarded for the Irish utilities. We therefore encourage Ofcom to continue to show leadership and consider the value of the spectrum in context of the benefits it brings to wider industry and how it enables future critical utility services. In summary the value the spectrum will bring to the critical utility services listed as we introduce new digital services is at least on a par with allocation to the PSNI and our uses cases are larger in volumes.

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 PSNI 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.	*Is this response confidential? – Y / N (delete as appropriate) See response to Question 2*
Question 3: Do you have any other comments on the proposals?	*Is this response confidential? – N* OFCOM have a duty to obtain best value for the spectrum available. The impact of not having affordable spectrum will hamper the development of a vibrant and technology enabled critical utility sector. Within N. Ireland we have an opportunity to create a shared spectrum model across electricity, gas, water, and transport. Therefore, the value for critical utility spectrum to the economy in Northern Ireland should at least be on a par with that being placed on the importance of enhanced communications for PSNI. NIE Networks are engaged with OFCOM, DFe, the NI Utility Regulator and other interested stakeholders to gain access to a dedicated LTE spectrum allocation. This would enable an enhanced Operational Control system based on a private LTE based network that would be shared by Electricity, Gas and Water Utilities and which in the case of the spectrum at 700 MHz could be designed and shared with PSNI to optimise the efficiency of spectrum use and the benefit to Northern Ireland. NIE Networks consider a shared utilities communications network is worth evaluating to make not only the most efficient use of the spectrum but also to reduce costs. This would require facilitation between various Government departments and the NI utilities and we recognise that there will be challenges in establishing and sharing such a communications network. In this regard we see merit in broadening the scope of this proposed allocation to include Critical System Operators in NI. NIE Networks would welcome further engagement with Ofcom on this matter.

Please complete this form in full and return to SpectrumForPSNI@Ofcom.org.uk.