

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional view that the current non-use of the unpaired 2100 MHz spectrum for high power mobile services and potential future use of the 1900 - 1910 MHz spectrum for the ESN Gateway, may not be optimal given the possible alternative uses of the spectrum?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 2: Do you agree with our provisional view that of the alternative high power uses of the unpaired 2100 MHz spectrum, national infrastructure uses such as rail and utilities are likely to be the most optimal?</p>	<p>Confidential? – N</p> <p>NIE Networks welcome Ofcom’s intention to enable spectrum access for utilities in a 3GPP band. However, the frequency proposed is much higher than the target sub-1GHz band and will require significant additional investment to deploy the required base stations to address coverage and availability requirements in Northern Ireland.</p> <p>We note one of the barriers that prevent future economic deployment cited by the current license holders for the unpaired 2100 MHz spectrum is the lack of equipment ecosystem. It is anticipated that it would take in excess of 10 years to build the ecosystem required which doesn’t meet our requirements to ensure the electricity network can facilitate government targets for 2030.</p>
<p>Question 3: Do you agree with our assessment that liberalising the spectrum and relying on trading is unlikely to be effective in securing optimal use of this spectrum?</p>	<p>Confidential? – N</p> <p>No comment</p>

<p>Question 4: Do you agree that revocation of the licences to enable reallocation may therefore be necessary to secure optimal use of the spectrum and that this is objectively justified and proportionate?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 5: Do you have further views / comments that you wish to make in respect of this consultation?</p>	<p>Confidential? – N</p> <p>NIE Networks welcome Ofcom’s decision to consider this spectrum for utility use. Increased monitoring and control of the electricity network is required to ensure necessary and cost effective network upgrades and the connection of further renewable generation and low carbon technologies. The electricity network is a key enabler for the energy transition and therefore it is imperative to invest in new smart technologies which rely heavily on IT and telecoms.</p> <p>The Department for Science, Innovation and Technology published two policy papers on 11th April (Spectrum Statement¹ and UK Wireless Infrastructure Statement²) highlighting the important role telecoms plays in helping the UK achieve the 2050 Net Zero target.</p> <p>Investment in the network is funded by customers through use of system charges in their electricity bill, therefore, it is important that customers are at the forefront of all decision making. NIE Networks, like other utilities in NI and GB, believe a private wireless telecoms network for all utilities will be the most economical solution for all. We welcome continued engagement with Ofcom to determine the most suitable use of Spectrum for NI utilities.</p>

Please complete this form in full and return to liz.hall@ofcom.org.uk.

¹ [Spectrum statement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/spectrum-statement)

² [UK Wireless Infrastructure Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/uk-wireless-infrastructure-strategy)