

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional conclusion that there is likely to be excess demand for the 412MHz band in future and that therefore an AIP fee is appropriate? Please provide any evidence to support your position.</p> <p>Question 2: Do you agree with our provisional conclusion that UK-wide exclusive Business Radio is the highest value alternative use for the 412MHz band? Please provide any evidence to support your position.</p>	<p>Confidential? – N</p> <p>n/a</p> <p>Confidential? – Y / N</p> <p>n/a</p>
<p>Question 3: Do you agree with our provisional conclusion to set the annual licence fee for 412 MHz equal to the Business Radio UK-wide fee for high usage bands? Please provide any evidence to support your position.</p>	<p>Confidential? – N</p> <p>As a regional water and sewerage company in England looking to utilise Smart water meter solutions to deliver significant improvement in our services to customers and protect the environment through reduced leakage and water demand management.</p> <p>Other water companies are currently deploying or looking to deploy Smart metering solutions also. We collectively are therefore expecting to become dependent on cost effective radio solutions along the lines of that experienced by the energy sector.</p> <p>We recognise the case made by Ofcom for an annual licence fee for this spectrum. However, we believe it is crucial that it is set at a level that does not slow down or restrict the roll-out of smart meter technology in the water sector or disadvantage the users of the 412 MHz spectrum relative to alternative technologies.</p> <p>It is important to note the water sector is at a relatively early stage in moving to the use of smart metering and we are not in the position</p>

	<p>of having a transition to Smart metering mandated upon the sector by Government.</p> <p>Therefore, we face a sensitive balance between the costs of operating Smart meter portfolios, including the costs to retrieve and manage the large amounts of data collected, and the value of securing future water supplies, reduce carbon emissions and protect the environment.</p> <p>Recently Defra and Ofwat has approved investment as part of the 'Green Recovery' that includes significant contributions to Smart water meter rollouts from 2022 to 2025 for two water companies. A spike in the costs to serve for these programmes could put at risk the benefits anticipated from these investments and potentially lead to higher costs being applied to water customers across the board.</p> <p>We would welcome Ofcom taking a more transitional approach to an annual licence fees regime, to reflect the gradual uptake of Smart metering by the water sector.</p>
<p>Question 4: Do you agree with our provisional conclusion that fees set based on our estimate of market value will best meet our statutory duties?</p>	<p>Confidential? – Y / N</p> <p>n/a</p>
<p>Question 5: Are there any other comments that you wish to make in respect of the proposals that we make in this consultation?</p>	<p>Confidential? – Y / N</p> <p>n/a</p>