



## EUTC Response to ‘Notice of Ofcom’s proposals for changes to the licence exemption for Wireless Telegraphy Devices’ 11 December 2019.

EUTC welcomes the opportunity to respond to Ofcom’s Proposals to implement a European Commission Decision on short range devices and to revoke the licence exemption for Railway Level Crossing Radar Sensor Systems.

We note that this proposal is intended implement EC Decision 1538 relating to spectrum for Short Range Devices in the bands 870-876 MHz and 915-921 MHz. This spectrum is becoming ever more important in the delivery of smart grid applications allowing EUTC members to deliver significant socioeconomic value. This is especially important as it will help utilities to contribute to the commitment in the New European Commission’s Green Deal to make Europe climate neutral by 2050 and the UK to honour its commitment as the first major economy to pass laws to bring all greenhouse gas emissions to net zero by 2050<sup>1</sup>.

<b>EUTC Spectrum Proposal</b>
<i>Within Europe, multiple small allocations within harmonised bands:</i>
<b>LESS INTENSE APPLICATIONS</b>
<ul style="list-style-type: none"> <li>• <b>VHF spectrum (50-200 MHz)</b> for resilient voice comms &amp; distribution automation for rural and remote areas. [2 x 1 MHz]</li> </ul>
<b>ANCHOR BAND</b>
<ul style="list-style-type: none"> <li>• <b>UHF spectrum (400 MHz bands)</b> for SCADA, automation, smart grids and smart meters. [2 x 3 MHz]</li> </ul>
<b>MORE DENSE APPLICATIONS</b>
<ul style="list-style-type: none"> <li>• <b>Lightly regulated or licence-exempt shared spectrum</b> for smart meters and mesh networks. (870-876 MHz)</li> <li>• <b>L-band region (1500 MHz)</b> for more data intensive smart grid, security and point-to-multipoint applications. [10 MHz]</li> </ul>
<b>FOUNDATION BANDS</b>
<ul style="list-style-type: none"> <li>• <b>Public microwave bands (1500 MHz – 58 GHz)</b> for access to utilities’ core fibre networks/strategic resilient back-haul.</li> <li>• <b>Public satellite bands</b> to complement terrestrial services for particular applications.</li> </ul>

## Our response

Question	Your response
<b>Question 1: Do you agree with Ofcom’s proposals to implement changes, that are consistent with the SRD Decision, within the 874 to 876 and 915 to 921 MHz frequency bands for SRDs?</b>	EUTC agrees that Ofcom’s proposals to implement changes are consistent with the SRD Decision. However, as the spectrum between 873-874MHz also lies fallow, we believe that Ofcom should take the opportunity to release this spectrum too, allowing a contiguous block of spectrum from 870-874.4MHz to be available for smart metering, smart home and the lower levels of smart grid applications. We see applications using this licence-exempt spectrum as complementary to smart grid implementations using licensed spectrum as outlined in the above EUTC Spectrum Proposal.
<b>Question 2: Do the proposed Regulations and proposed changes to IR 2030 correctly implement our proposals?</b>	EUTC agrees that the proposed Regulations and proposed changes to IR 2030 correctly implement Ofcom’s proposals, but should be augmented by necessary changes to IR 2030 to allow the spectrum from 873-874MHz to be released too.

<sup>1</sup> <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>



**Question 3: Do you agree with Ofcom's proposals to remove the licence exemption currently in the 2010 Regulations for Railway Level Crossing Radar Sensor Systems?**

No response.

### ***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.*

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