

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: **Consultation on 870 - 876 MHz and 915 - 921 MHz**

To (Ofcom contact): **Steve Jones**

Name of respondent: **Johnny Dixon**

Representing (self or organisation/s): **BT plc**

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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DECLARATION

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Name **Johnny Dixon**

Signed (if hard copy)



Issue 1

BT's response to the Ofcom consultation document:

Consultation on 870 - 876 MHz and 915 - 921 MHz

(Issued by Ofcom on 23 January 2013)

INTRODUCTION

BT is pleased to have the opportunity to comment on these latest proposals from Ofcom concerning the 870 – 876 MHz and 915 – 921 MHz bands.

We welcome this consultation on these proposals at this stage, even though Ofcom have recognised that there are currently a number of uncertainties surrounding this frequency band, namely:

- a) Whether the 870 – 872 MHz and 915 – 917 MHz band will be available from MoD
- b) The DECC position on their strategy for the Smart Metering HAN
- c) The FRS spectrum decision on Breathing Apparatus Telemetry
- d) The on-going work in CEPT on SRDs and RFIDs

The consultation notes that there will be a better understanding of these considerations in the Spring 2013. We also understand that the DECC proposal for a HAN introduces a difference in approach compared to smart metering implementations in other European countries and this will need to be considered and understood carefully when the DECC strategy has been issued.

Nevertheless, we consider that there would be benefit in identifying some of the spectrum for a Smart Metering Home Area Network (HAN), providing the operating parameters for the band are optimised for that particular application (i.e. short range, and very low duty cycle), in order to avoid interference by other applications.

In this response we present our opinions based on the information currently available, although it is not possible to conclude on the details for the future use of these bands because CEPT will not complete their work on SRDs and RFIDs until Autumn 2014.

RESPONSES TO THE QUESTIONS IN THE CONSULTATION DOCUMENT

Question 1 - What other developments, in addition to the international and public sector developments we have identified, are relevant to our identification and assessment of options for release?

We consider that Ofcom have correctly identified all relevant developments for consideration in this consultation, recognising that many of these developments identified are actually “work in progress”, and therefore the full implications of these cannot be assessed at present.

Question 2 - Do you have any additional information or analyses that could help to inform our assessment of the value that could be created through different uses of the spectrum?

BT has no further information to share at this time.

Question 3 - Do you agree with our proposal to release 870-876 MHz / 915 -921 MHz for licence exempt SRD and RFID applications if Government releases 870-872 MHz / 915-917 MHz?

We are aware of the forthcoming need to identify spectrum for a Home Area Network for Smart Metering purposes, and we believe that the lower frequency band offers an excellent opportunity to address this requirement.

We understand that the studies in CEPT are with the intention of identifying the band for SRDs, and it is difficult for Ofcom to licence exempt such a band for a specific application. However, it is possible for the operating restrictions to be tailored to maximise the opportunity for a particular application. Recognising that a Smart Metering HAN would be a short range, very low throughput network, the opportunity for this application could be maximised through the careful choice of transmitter power and duty cycle. Ofcom needs to determine what power level is optimum for the HAN application and influence CEPT/ETSI accordingly as UK specific limits for licence-exempt technology could be difficult to enforce. We understand that a power limit of around 10mW and a low duty cycle could be appropriate for HANs associated with Smart metering. While this would not prevent applications other than a smart metering HAN, it would limit the use by other higher power devices that could cause interference, and in so doing would ensure that the HANs can operate appropriately to connect the meters to an in-home access point, providing a vital component of the smart metering eco-system.

In the case of the upper band (915-921MHz), we recognise that this would present a good opportunity for the growing market for RFID, particularly as this band would align with part of the RFID used in North America. (We understand that the use of RFID in North America is well ahead of Europe, and hence there would be significant benefits in have a common frequency range.)

Question 4 - Do you agree with our proposal to release 872-876 MHz / 917-921 MHz for licence exempt SRD and RFID applications if Government does not release 870-872 MHz / 915-917 MHz?

The same response applies as per our response to Question 3 above.

Question 5 - Do you have a view on the sequencing and timing of Ofcom's next steps if the spectrum is released for licence exempt SRD and RFID applications?

Whilst it is understood that it is premature to try to conclude on the details of the operating parameters, we would support the proposal from Ofcom that:

- The lower band (870 / 872 – 876 MHz) is identified in principle for smart metering Home Area Networks (HAN), as a short range (i.e. low power), very low duty cycle application, and
- The upper band (915 / 917 – 921 MHz) is identified in principle for RFIDs

We would support Ofcom continuing to engage with the appropriate bodies (CEPT, ETSI, DECC and MoD) to resolve the outstanding questions, and to develop appropriate regulatory measures in accordance with the provisional timetable laid out by Ofcom in the consultation document.

END