



Consultation on the License Exempt Release of 870 – 876MHz & 915-921MHz

WHP Wilkinson Helsby welcomes the opportunity to respond to Ofcom's consultation regarding the release of spectrum in the bands 870-876MHz and 915-921MHz. WHP Wilkinson Helsby provide end to end professional telecommunications infrastructure support services to utilities companies, mobile operators and hardware manufacturers. As such, we have an interest in any regulatory changes which may impact our client's ability to successfully deploy their networks and satisfy their customers' requirements and regulatory obligations.

We are generally in support of Ofcom's approach over recent years with regard to a more liberal approach to spectrum usage & management.

We are responding to this consultation in the context of an organisation wishing to see advances in the availability of machine to machine communications generally and specifically in the areas of electricity network automation and Smart grids / Smart metering, which are crucial to allowing the UK to meet its CO2 emissions targets. Our responses are not intended to lend support to any particular organisation at the expense of another. We recognise that the availability of spectrum in the sub 1GHz region is critical if Smart metering and a host of other M2M applications (already enjoyed in other nations) are to be brought to the UK market.

Our answers to the five consultation questions can be found below.

Q1 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 believe that the majority of current and future developments have been identified at high level within this and previous Ofcom consultations. A long list of further specific applications and developments could be compiled but they could be adequately categorised under one of the machine to machine application areas already outlined.

Q2 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?

It is difficult to accurately assess the potential value of a particular piece of spectrum – we acknowledge that there are a number of specialist consultants who are well placed to provide hypothetical answers to this question. However, we would point out that in addition to the potential value created by the use of the spectrum, there also needs to be consideration of the cost to the UK economy if the spectrum is not released. To take Smart Grid and Smart Metering as just one example – without the availability of this spectrum it is possible that UK consumers could either be denied access to Smart Grid technology (resulting in higher energy bills) or will be charged for the implementation of a more expensive, non-ideal technology solution. There are numerous examples within the areas of logistics, entertainment, security, transport, health care and retail where the UK would be competitively disadvantaged if access to this spectrum is not made available.



Q3 Do you agree with our proposal to release 870-876 MHz / 915-921 MHz for license exempt SRD and RFID applications if Government releases 870-872 MHz / 915-917 MHz?

Yes.

Q4 Do you agree with our proposal to release 872-876MHz / 917-921MHz for license exempt SRD & RFID applications if Government does not release 870 – 872 MHz / 915-917 MHz ?

Yes – although there would be significantly greater benefits if Government can release the larger allocation.

Q5 Do you have a view on the sequencing and timing of Ofcom's next steps if the spectrum is released for license exempt SRD and RFID applications?

There are a number of critical projects on the horizon (Smart Grids & Smart Metering being probably the most urgent) which require confirmation of Ofcom's position regarding this spectrum as soon as possible. Globally, all of the large scale Smart Grid deployments and trials have been reliant upon this type of spectrum for 'last mile' connectivity to gas and electricity meters. The number of organisations who currently have access to spectrum which is suitable for M2M applications is very small – and hence the opportunities for a truly competitive market are limited. Given the challenges of rolling out the communication infrastructure around Smart Grids, we believe that Ofcom should aim to release this spectrum at the earliest opportunity. Any remaining interoperability issues with existing users should be tackled as a matter of urgency.

If adopted, the proposals in this consultation will have many benefits for the UK economy. The most immediate and tangible of these benefits applies to the utilities / energy sector. If the proposals are not adopted at the earliest opportunity, then the UK risks being disadvantaged compared with other developed nations who already benefit from services afforded by M2M technology operating in similar allocations around the globe.

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