Title:

Mr

Forename:

Neil

Surname:

Ovenden

Representing:

Organisation

Organisation (if applicable):

ATOC

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Comments:

ATOC do not propose to submit detailed answers to each of the specific questions below.

ATOC's response is limited to those potential applications that we believe have operational benefit for the railways and its customers, and to the question about licencing regime which are summarised below and in our accompanying letter:

Broadband wireless data comms between trains and static control centres

Broadband wireless data comms between on track and trackside infrastructure and static control centres

Passenger information services, including seat and wheelchair space availability, information about connecting services, car parking, bus or taxi availability etc, delivered both to passenger carried portable, wireless devices and to train borne communication systems

Delay information, including connecting rail and tube services etc, delivered both to passenger carried portable, wireless devices and to train borne communication systems

Timetabling and ticketing information delivered to passenger carried portable, wireless devices

Freight consist management and tracking information

Our belief is that the best means to realise the above is for a single licnce to be granted for this spectrum covering the whole of the GB mainland

Question 1: Do you believe that the uses listed in this section (Section 3) are possible candidates of the 872/917 MHz bands?:

Question 2: Are there additional applications/services (not listed above (from Section 3) that could make viable use of the 872/917 MHz bands that Ofcom should be aware of?:

Question 3: What services do you believe should be authorised to use this band? Could you supply relevant information supporting your preference and include any economic data relating to the value of the spectrum in providing these services?:

Question 4: Do you agree with the methods used to assess the potential to interfere with adjacent band services in a full licensed approach?:

Question 5: Do you consider that the proposed technical licence conditions would be justified and appropriate?:

Question 6: Do you agree with the methods used to asses the likelihood of services interfering with adjacent band services under the light regulatory approach?:

Question 7: We would like stakeholder views on the cost and performance impact of the UMTS900 filters described above.:

Question 8: Are there are any other methods that would give the same protection as the filters? What costs and performance impacts would these have?:

Question 9: What are your views on the need for and justification of such mitigation measures and how their cost should be borne?:

Question 10: Stakeholders views are sought on whether the spectrum should be awarded as a single lot by frequency, or whether it should be split in to smaller frequency lots.:

Question 11: We would like stakeholder?s views on whether the packaging should be split GB/NI or if we should proceed with UK wide packages.:

Question 12: Would it be practical for RFID users and adjacent operators (e.g. GSM, UMTS, GSM-R) to co-ordinate locally on a case by case basis? The answers to this will help Ofcom develop its views on whether a database would be required.:

Question 13: Do you agree with Ofcom?s preliminary proposal that the separation distances suggest a light licensing regime if SRD/RFID use in this band were to be supported? If not, how should the interference into adjacent bands be managed?:

ATOC

ASSOCIATION of TRAIN OPERATING COMPANIES

3rd Nov 09

The Way Forward for the Future Use of the Band 872-876 MHz, Paired With 917-921MHz

Dear Mr Austin,

I am writing on behalf of the Association of Train Operating Companies (ATOC) in response to your consultation exercise on the future use of the above additional radio spectrum.

ATOC is the trade association representing the interests of its members, which consist of all the GB mainline, franchised passenger train operators and the major GB rail freight operators.

ATOC, on behalf of its members, has been engaged with Network Rail over the past few years in the development of suppliers of equipment for and the protocols for use of the GSM-R radio system currently being rolled out over the GB mainline rail system.

Our members share an aspiration to make the experience offered to and enjoyed by their customers more complete and better customised to their individual needs. To this end, we believe that the possibility of being able to use this additional spectrum to enhance train to lineside and station/freight yard to control centre communication capabilities would be extremely valuable.

We would like to make the following specific points in relation to your question about possible uses for this spectrum and which we believe would offer significant direct and indirect rail passenger and rail freight user benefits:

- Passenger information services, including seat and wheelchair space availability, information about connecting services, car parking, bus or taxi availability etc, delivered both to passenger carried portable, wireless devices and to train borne communication systems
- Delay information, including connecting rail and tube services etc, delivered both to passenger carried portable, wireless devices and to train borne communication systems
- Timetabling and ticketing information delivered to passenger carried portable, wireless devices
- Freight consist management and tracking information

Our belief is that the best means to realise this aspiration is for a single licence to be granted for this spectrum covering the whole of the GB mainland.

Yours sincerely,

Neil Ovenden

Engineering Manager

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