Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

Ofcom's "Consultation on the way forward for the future use of the band 872 - 876 MHz paired with 917 - 921 MHz": Consultation Response by RSSB

To (Ofcom contact): Mark Austin

Name of respondent: Anson Jack

Representing (self or organisation/s): RSSB

Address (if not received by email):

CONFIDENTIALITY

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

Nothing	X	Name/contact details/job title	
Whole response		Organisation	
Part of the response		If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here. ☐

Name Siraj Ali Signed (if hard copy)

Mr Mark Austin
Mobile Services Spectrum Team
OFCOM
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

6 November 2009

Dear Mr Austin,

The way forward for the future use of the band 872-876 MHz paired with 917-921 MHz

I write in response to your consultation exercise on the future use of the available additional spectrum. RSSB's role within the rail industry is to build consensus and to facilitate the resolution of cross-industry issues. In preparing these comments we have consulted with the principal industry sectors through a cross-industry project group; therefore whilst the views expressed below are those of RSSB, they are supported by the industry as a whole. It should be noted that that the remarks below refer only to the main line railway network in Great Britain; railways in Northern Ireland are operated separately by Northern Ireland Railways.

Railway operation in Great Britain is divided between infrastructure management responsible for track, signalling and structures, and train operators which actually run the trains themselves. The infrastructure manager is Network Rail. Its customers consist of passenger and freight train operators, collectively represented by the Association of Train Operating Companies (ATOC).

Great Britain's railways are a major success story. The network is now carrying more passengers than at any time since the aftermath of the Second World War and freight traffic is also increasing on a long-term trend. As road and air travel become increasingly less attractive due to congestion and security restrictions there is every reason to believe growth will continue. Furthermore, rail is the most sustainable form of long-distance transport and is therefore capable of delivering significant environmental benefits.

GSM-R and GSM-RE are technologies which will deliver huge societal benefit in-terms of safe and efficient railway operation, both for domestic and interoperable trans-European train services. As you will be aware, the European Conference of Postal and Telecommunications Administrations (CEPT) has now taken the decision to allow railway administrations to request additional frequencies from their national frequency authorities. Allocating this part of the spectrum to the GB railway will allow future railway applications to provide a higher level of availability and reliability, due to their safety-related nature, that is not necessary in public networks.

The current situation with mobile networks is that whereas the providers have developed commercial UK-wide networks, these do not provide continuous coverage for the Great Britain rail system as a whole. The rail industry is currently undertaking a research project examining the rail industry's case for using the additional spectrum and the details of the potential applications and their benefits. RSSB believes it is vital that Ofcom licences the spectrum in a way that will allow these benefits to be realised.

For these reasons we would strongly favour a single licensed approach that would allow the rail industry to use the spectrum for essential railway operational requirements. We would hope that this consultation exercise will form the first phase of an ongoing dialogue between yourselves and the rail industry, aimed at achieving the maximum benefit from this additional spectrum.

I have also enclosed a letter supporting this position from the chairman of the Railway System Interface Committee for Vehicle/Train Control and Communications. You will be aware that the UIC has submitted a response which sets out the aspirations of the European railway community; Network Rail and ATOC have also submitted responses. In the meantime if you have any further questions or require clarification, please contact me.

Yours sincerely,

Anson Jack
Director of Policy, Research and Risk

V/TC&C SIC

Vehicle / Train Control & Communications
System Interface Committee
Rail Safety and Standards Board
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Mr Mark Austin
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05 November 2009

Dear Mr Austin

The way forward for the future use of the band 872-876 MHz paired with 917-921 MHz

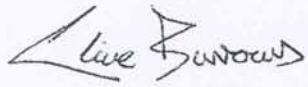
I write on behalf of the Railway System Interface Committee for Vehicle/Train Control and Communications (VTCC) in response to your consultation exercise on the future use of the additional spectrum. The purpose of a systems interface committee is to assist the railway industry to manage all aspects of identified systems interfaces in the most cost-effective and efficient way. To do this the committees bring together senior representatives of the passenger train operators, non-passenger train operators, Network Rail, rolling stock owners, infrastructure contractors and suppliers. VTCC is specifically concerned with the full range of signalling and control systems.

VTCC takes a close interest in the development of future communication and positioning systems on the rail network. We have supported a research project, as part of the railway industry's overall research and development programme, to examine the case for the rail industry using the additional spectrum adjacent to the existing GSM-R band. The overall intent is to achieve a ubiquitous operational wireless lineside for the Great Britain rail network. We look forward to sharing the findings of this research project with yourselves.

We are aware that the rail industry is providing you with detailed responses to the questions posed in the consultation document, which support a single-licensed spectrum. We consider that the use of the additional spectrum offers the scope for significant operational and safety improvements.

We see it as vital that the rail industry has the opportunity to exploit the potential of this additional spectrum and we trust that you will consider carefully the points made in the industry responses.

Yours sincerely



Clive Burrows FREng
Group Engineering Director