

**Scope Communications response to the Radiocommunications document titled
“The future use of the 169 MHz Band” May 2002**

1. Introduction

This document expresses the views of Scope Communications, which has managed significant growth within the niche market aspects of On-Site paging, whilst the mature elements of Wide Area, Local Area and On-Site markets have declined.

5.1 Comments and views on all aspects of this consultation are invited from interested parties. In particular:

- i) The Government believes pan-European paging will not develop in this band and that there is sufficient spectrum for paging in other bands. The Government therefore seeks views on the suitability of the 169MHz band for services other than paging.

Scope agrees with the Government in as much as the wide area market has seen, and will continue to see, significant decline. Scope disagrees that there is sufficient spectrum available for paging in other bands as this spectrum is fragmented with no harmonisation across member countries, which places significant hurdles to any SME manufacturer that wishes to market product across Europe.

- ii) Any suggested re-use for the 169MHz spectrum may take into account that the band is currently allocated for a high power application (400W). Candidate replacement applications may similarly be high power alternatives. This being the case, a previously negotiated agreement whereby adjacent band services are protected from interference would still be valid and new entrants may be required to pay for site engineering costs to reduce any interference to within agreed limits. The current allocation for high power usage does not exclude consideration of low power alternatives.

Scope would like to see four channels allocated for low power On Site uses such as Short Range Business Paging (SRBP). SRBP is currently seeing excellent market growth in the UK and as a company we are frustrated on a daily basis with enquiries from many European Countries for product, only to realise that the ability to penetrate those markets is artificially impaired as there is no harmonised frequency allocation. Harmonising channels across Europe will expand the market and allow manufacturers to compete across borders.

- iii) A pan-European harmonised allocation is desirable given the benefits resulting from harmonised spectrum use.

Absolutely, the problem is the cost of manufacturing product that requires receivers to be frequency agile across 30 MHz of spectrum. This makes the market impossible to penetrate due to the high cost of producing and holding stocks while you build a market. The pan-European ideal would enable Scope to build products, which could be sold into smaller countries where the market is simply limited by population. However, when these markets are considered collectively they present a significant and worthwhile investment with phenomenal growth potential!

- iv) National solutions, rather than those agreed through CEPT, should not be detrimental to Community measures that facilitate a single market.

Scope agrees entirely. This is, after all, the fundamental reason for legislation such as the R&TTE Directive. *National solutions should not be allowed*, especially where they interfere with harmonised uses.

- v) The Government seeks views on the foreseen demand for additional spectrum and the suitability of using the 169 MHz band for the alternative services listed below. The Government is also interested in receiving suggestions for other services that may be appropriate for the 169 MHz band.

Uses for SRBP are limited only by the imagination. Because of a relaxed licensing regime, and very low cost SRBP is used across a wide variety of applications and due to its short range and minimal transmit time, the channel usage can be exceptionally dense with little or no interference. There will ALWAYS BE a market for a portable radio receiver that provides information informing an individual or group that their attention is required and that market size will only be limited by price and availability. The problem in the past has been the relatively high cost of the product. Prices have fallen to the point where pagers are now almost disposable rather than serviceable. Huge potential exists right across Europe for simple devices that can be hooked up to equipment never intended to interface with paging equipment. These devices include CNC lathes, milling machines, plastic injection moulding plant, and a host of other automated equipment that only require operator attention when they are due to run out of raw materials, or the hopper is full of completed components or when a specialist technician is required. SRBP can provide the critical communication link in a very cost competitive form within the UK but is inhibited within Europe generally. The reason for this is the fragmented spectrum, lengthy and often difficult licensing procedures and the cost to the manufacturer to try and produce equipment suited to all markets. Europe needs to have the foresight of the RA to enable the efficiencies that this type of product can provide to industry. Uses are endless and the applications extend to the hospitality industry, restaurants, leisure and crèche markets. There are currently no harmonised frequencies for SRBP. Pan European channels will open up new markets, which are currently artificially strangled by the lack of harmonised relaxed licensed spectrum. It would vastly reduce manufacturing costs and allow the smaller markets to be economically developed into something worthwhile.

- vi) Given the Government's preference to maintain spectrum allocation for a harmonised pan-European service the Government seeks views and comments from industry on the need for harmonised allocations for the proposed alternative services.

Harmonisation is the essential ingredient to make the volumes viable with respect to production costs and cross community sales. This must also be viewed alongside a relaxed and much simplified licensing system if European SRBP is to achieve anywhere near its full potential.

2. Conclusion

If Europe wishes to retain any form of paging industry, it should accept that the industry must evolve to survive. It must be accepted generally, that Paging is the most efficient form of alerting someone to the fact that their attention is required. The classic example is the Hospital cardiac arrest team. If Europe wishes to retain manufacturers that can supply such strategic systems, then they must recognise their need to survive with a shrinking conventional market. It must allow them to adapt to meet the new challenges of an evolving market and provide the limited spectrum and simplified licensing that this requires. Whilst the industry in general would probably prefer an allocation in the UHF band, the fact that the 169MHz band is available and has already achieved substantial harmonisation, means that it has to be viewed very positively by industry.