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**RESPONSE BY THE
TELECOMMUNICATIONS ADVISORY COMMITTEE
TO THE
CONSULTATION DOCUMENT ON
SPECTRUM PRICING
YEAR FIVE**

INTRODUCTION

This response is provided by CSS Spectrum Management Services Ltd., on behalf of the Telecommunications Advisory Committee (TAC).

TAC is Chaired by Mr Mike Halliwell, of the Environment Agency.

TAC has been established for over 10 years and represents the interests of the United Kingdom Water Industry on a range of matters related to Mobile and Fixed Communications and Radio Scanning Telemetry.

The membership is drawn from representatives from the following Industry Groups:

- 10 Water Service Companies
- 15 Water Supply Companies
- Scottish Water
- Environment Agency
- Dept of Regional Development Water Service Northern Ireland

The Water Industry (WI) has been a major user of Private Business Radio systems. They operate a number of analogue trunked radio systems. In addition, increasing use is being made of Public Cellular, provided by the UK Service Providers on the GSM 900 and GSM 1800 systems.

The Water Industry is also a major user of licensed Radio Scanning Telemetry systems which are designed and assigned to the IR 2037, VNS 2111, RA375 (previously the MPT 1411 specification).

The Committee has provided input into the various stages of the Spectrum Review and the resulting Consultative Documents leading to the 1998 WT Act and the various Consultations which have followed.

Management and support for matters related to Water Industry mobile communications and Scanning Telemetry are provided by CSS Spectrum Management Services. This relationship provides the RF engineering and planning necessary to ensure that the most effective use is made of the radio spectrum. It also acts as a focus for the Industry and deals with financial matters related to RA, DTI and Oftel.

CSS also act as the common point of contact for the equipment manufactures and Service Providers.

In liaison with the TAC membership, CSS has developed the second phase of a Water Industry Mobile Communications Strategy for the medium and long term which will be published in May 2002.

SCOPE OF THE CONSULTATION

The members of TAC have recognised the need for effective use of the radio spectrum. This has already been demonstrated by the sharing of spectrum and radio systems over the past twelve years. The members have recognised the benefits offered by the introduction of Spectrum Pricing and have supported the Radiocommunications Agency with their development of the detailed pricing options in a number of area.

RESPONSE TO PROPOSALS

Chapter 2

Fixed Terrestrial Links, Scanning Telemetry, Unco-ordinated Links, Permanent and Transportable Earth Stations and Satellite Links

Scanning Telemetry

The Water Industry continues to support the migration to National Channels for its members.

In the case of the eight channels used for the non-utilities, the Industry supports the introduction of a charge per channel used at each base station. This approach will encourage the effective use of channels within a given geographic area, and discourage the use of this spectrum for small systems and links which could make use of alternative technology.

Q1. These proposals for fixed links reiterate points raised in previous consultations. Do you have any further comments on these proposals?

Question 1.

We do not have additional comments.

Q2. These proposals for satellite link reiterate points raised in previous consultations. Do you have any further comments on these proposals?

Question 2.

We have no additional comment on this proposal.

Chapter 3: Proposals for Public Telecommunications Network Services (PTN)

Q3. The proposals for a new network licence continue the rollout of a consistent approach to pricing in the satellite sector. Do you have any comments on these proposals?

Question 3.

We have no comment on this issue.

Q4. These proposals for public telecommunications network services reiterate points raised in previous consultations. Do you have any further comments on these proposals?

Question 4.

We have no comment on this issue.

Chapter 4: Proposals for Programme Making and Special Event licences

Q5. These proposals for Programme Making and Special Events reiterate points raised in previous consultations. Do you have any further comments on these proposals?

Question 5.

We are not in a position to comment on this issue.

Chapter 5: Proposals for Private Business Radio (PBR)

Q6. These proposals for Private Business Radio reiterate points raised in previous consultations. Do you have any further comments on these proposals?

Question 6.

In regard to channel access procedures for transmission of data messages IR2008, the industry has some concern over the time scales for the cessation of licensing of MPT 1379 equipment. This new technology requires the development of not only new equipment but an inspection and test regime.

Where a number of different organisations are involved the initial and subsequent resolution of problems with any new system can be difficult and time consuming.

It is assumed that the proposed time scales are based on the premise that the system and sharing process will work without problems.

The Agency may wish to consider an extension clause to the ongoing licensing and final closure date for MPT 1379 equipment if there are practical problems with the introduction of this technology, especially as

the time scale to migrate to the new standard is less than five years from this consultation.

Chapter 6: Proposals for Maritime licensing

Q7. This new proposal for Ship Fixed Radio licence aims to bring a consistent approach with other maritime regulatory requirements. Do you have any comments on this proposal?

Question 7.

We have no comment on this proposal

I trust that the Radiocommunications Agency will find these comments of value. However if you need any additional information please do not hesitate to contact me.

Yours sincerely,

David Tripp. C. Eng. MIEE.
Managing Director
Chairman of the Spectrum Management Group