



# JRC Response to the Radiocommunications Agency consultation on Introducing Recognised Spectrum Access

## Key Points

- ❑ The introduction of Recognised Spectrum Access charges for services not currently subject to spectrum charging will eliminate an anomaly and provide a rational basis for levying equitable charges on services operating in the UK but currently evading Wireless Telegraphy Act costs.
- ❑ Application of Spectrum Pricing and Trading to Recognised Spectrum Access Authorisations is a sensible and logical approach.
- ❑ The scope of Recognised Spectrum Access should extend to include the Mobile Satellite Service to extend to consumers the potential for a protected service whilst at the same time promoting fair and equitable competition between terrestrially based and satellite services.
- ❑ It is not clear to us why the mobile satellite allocations in 137-138 MHz and 149-150.05 MHz are not included in Annex D.
- ❑ The concept of Recognised Spectrum Access may provide a mechanism for evaluating (but not necessarily charging for) protection that may be offered to other services such as Low Power Devices, Power Line Carrier, Citizen's Band, Amateur services, Radioastronomy, scientific research, etc.

## Replies to specific Questions

1. JRC considers that RSA should be introduced for satellite services.
2. JRC believes that RSA should be introduced for ALL satellite services, in particular the mobile satellite service.
3. The recognition granted by RSA may need to be defined by a number of complex technical parameters including geographical area, power flux density limits, protection requirements, duty cycle and time.
4. We believe that RSA should be tradable and interchangeable with licences to facilitate the development of a flexible and dynamic market. It would reduce the burden of control on any central regulator who could then adopt a supervisory rather than an interventionist role.
5. There may be benefit in making available both perpetual and fixed term RSAs. Guaranteeing a fixed term to the operator of a satellite service could give assurance that the spectrum will be available on a time frame commensurate with the life of the satellite network. For the radioastronomy and space science communities where specific frequencies and frequency bands have unique properties, RSA could afford a more substantial recognition of their special requirements.

6. The spectrum pricing principles being applied to Wireless Telegraphy Act licences should apply to RSA. The concept should be the opportunity cost of the spectrum subject to RSA; but with an over-riding principle that the beneficiary of an RSA should not pay less than the full administrative cost of the RSA, in particular the costs associated with any international activities by the UK Government to obtain or protect a given spectrum allocation. [At present, UK government agencies may commit substantial resources to international negotiations to facilitate the introduction of new satellite services, but the costs of these activities are borne by existing and future UK Wireless Telegraph Act Licensees with whom these new services will compete, but never make any financial contribution to their associated costs.]

7. Administrative incentive pricing fees should be calculated based on existing principles devised for terrestrial services in similar frequency bands.

8. As the Consultation Document itself identifies, there could be merit in applying RSA to other categories of radio services, such as Crown services; passive services such as radioastronomy, science services and remote sensing; and low power/licence exempt devices.

## **Background**

A. JRC Ltd is a wholly owned joint venture between the UK electricity and gas industries specifically created to manage the radio spectrum allocations for these industries used to support emergency and safety critical operations. JRC also represents gas and electricity interests to government on radio issues.

B. JRC manages 4 MHz of spectrum, of which 2.8 MHz is for PMR applications and 1.2 MHz for telemetry and telecontrol services. JRC created and manages a national cellular plan for co-ordinating frequency assignments for some of the largest PMR networks in the UK.

C. JRC manages VHF and UHF allocations. These networks keep the electricity and gas industries in touch with their field engineers throughout the country. The networks provide comprehensive geographical coverage to support the installation, maintenance and repair of plant in all weather conditions on a 24 hour/365 days per year basis.

D. The Scanning Telemetry Band is used by radio based System Control and Data Acquisition (SCADA) networks which control and monitor safety critical gas and electricity industry plant and equipment throughout the country. These networks provide reliable communications to unmanned sites and plant in remote locations.

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