

MPS response

Future use of the 700MHz band

Questions

Question 1: *Have we correctly identified and characterised the potential costs set out above, and what other costs – if any – should be taken into account in our assessment?*

Para 3.11 & 4.23 refers to the Emergency Service use to provide Public Protection and Disaster Relief services (PPDR) for mobile use. The increased use of shared data by First and Second responders is essential going forwards to reduce to reduce our communication costs. Failure to take this opportunity to globally harmonise the use of part of this band for such use will remove these potential costs reductions if interoperability is to be improved as per government requirements.

Question 2: *What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential costs? Please identify any sources of specific evidence to which we should have regard.*

The result of not having this globally harmonised piece of spectrum for PPDR is impossible to quantify. However, two overriding factors should be considered - disasters and improved economics of a more effective everyday emergency service provision.

Question 3: *Have we correctly identified and characterised the potential benefits set out above, and what other benefits – if any – should be taken into account in our assessment?*

The provision of spectrum to deliver mission critical broadband services to the emergency services will make them more effective and able to deliver service to society.

Question 4: *What evidence, whether qualitative or quantitative, should we obtain and/or take into account in assessing each of these potential benefits? Please identify any sources of specific evidence to which we should have regard.*

Any report on disasters, demonstrations that got out of control, terrorist acts that kill or injure people, etc end up making reference to failures in communication as being contributory factors. This is surely all the evidence that is needed to once and for all provide the capability to emergency service to remove this factor by

ensuring that mission critical broadband is available to deliver voice, video, databases etc.

Question 5: *In particular, what is your view of the likely future demand for additional sub 1 GHz spectrum for the provision of mobile data services, and what evidence supports this view?*

PPDR future requirements for mobile data are increasing and will continue to do so over the next decade this will include the need for live streaming video, picture stills, maps, building floor plans, TV News feeds, etc. The other aspect to consider with mission critical data is that there will be a greater requirement for uplink speeds / bandwidth not normally required by the domestic consumer as live streamed video will provide the information back to the control rooms to aid command & control. This being yet another reason for spectrum being allocated to emergency service as the requirements are different from the general consumer.

Question 6: *Should we place different weights on some costs and benefits than on others, for example depending on whether costs would be borne by consumers, DTT operators, or mobile operators?*

As stated earlier the ability to put “business case” type values / costs to emergency service area “societal value of effective emergency services” is not possible. So who should bear the costs depends upon where society believes the cost should be.

Question 7: *Do you have any other comments on the work we are currently undertaking on potential costs and benefits?*

The MPS strongly support the view that a minimum of 2 X 10MHz (Report 199, CEPT/ECC calculate this as the minimum for wide area coverage for PDR in Europe) of the 700MHz spectrum should be reserved for emergency services use which aligns to the current global thoughts for harmonisation of spectrum for PPDR use. The improved economics of a more effective emergency service provision being the result.

The spectrum may in reality be given to a commercial operator to provision a network on the understanding that under BAU circumstances any capacity not used could be used by them for normal commercial / consumer traffic but when required to fulfill communication needs this commercial / consumer traffic is removed from the network. This would then maintain effective and efficient use of the spectrum with the potential for an income stream (for government, in place of a one-off sale price) from the traffic that is making use of the capacity that delivers requirements under large planned or unplanned events.

Question 8: *Have we correctly identified the costs and benefits that could vary depending on the timing of release, and the impact of those factors? Are there other costs and benefits which would vary depending on the timing of release of the 700 MHz band which we should take into account?*

Yes

Question 9: *How quickly could the 700 MHz band be released? What would be the impact on DTT infrastructure costs of releasing at the earliest possible time compared to a later time? What would be the factors which affect these costs?*

No comment

Question 10: *How, and to what extent, are the costs for existing (PMSE) and potential (WSD) interleaved users of the 700 MHz band likely to vary depending on the timing of release? What would be the factors which affect these costs?*

No Comment

Question 11: *Should we consider any other cost-related arguments / evidence in favour of an earlier or later release date?*

No Comment

Question 12: *What would be the impact on mobile broadband delivery and competition of releasing the 700 MHz band later rather than sooner?*

Delivery of Mission Critical Broadband for the emergency services is likely to be delayed

Question 13: *Should we consider any other benefit-related arguments / evidence in favour of an earlier or later release date?*

Earlier release would not benefit the emergency services as devices and functionality for mission critical voice will not be available sooner.

Question 14: *Is the range of potential dates for release likely to be wide enough to merit consideration of an incentive auction approach?*

No comment

Question 15: *If so, what are the challenges to designing an effective incentive auction in this case, and how might these challenges be addressed?*

No Comment

Question 16: *If we followed an incentive auction approach, how should we take account of wider costs and benefits – i.e. those not felt by participants in the auction?*

No Comment

Question 17: *Do you have any views at this stage as to the parameters of an incentive auction, such as the default date and payment mechanism?*

No Comment

Question 18: *Is there a version of the overlay auction approach which could be suitable for 700 MHz release?*

No Comment

Question 19: *What are the benefits and risks of conducting an overlay auction in this case?*

No Comment

Question 20: *Have we correctly identified and characterised the potential impact of 700 MHz release on consumers accessing DTT? What other impact – if any – should be taken into account in order to identify pre-emptive measures to reduce this impact?*

No Comment

Question 21: *Do you have any comments on the pre-emptive measures relevant to DTT identified above? Are there other pre-emptive measures we should be considering?*

No Comment

Question 22: *Have we identified the correct measures to support consumer adoption of DVB-T2?*

No Comment

Question 23: *What regard, if any, should we have to wider technical evolution of the DTT platform, such as HEVC?*

No Comment

Question 24: *Have we correctly identified and characterised the potential impact of 700 MHz release on PMSE users? What other impact – if any – should be taken into account in order to identify pre-emptive measures to mitigate this impact?*

No Comment

Question 25: *Do you have any comments on the pre-emptive measures identified above? Are there other pre-emptive measures we should be considering?*

No Comment

Question 26: *Do you have suggestions for how we can assess the impact on PMSE users and equipment if 700 MHz is no longer available for PMSE use?*

No Comment