



Vodafone response to Ofcom consultation:

“Licence Exempt Short Range Devices in the 870 to 876 MHz and 915 to 921 MHz Bands: Technical Proposals”

VODAFONE RESPONSE

Vodafone welcomes Ofcom's continued efforts to release the spectrum from 870-876MHz and 915-921MHz in line with the work that has been carried out within CEPT and that has been recently ratified at its 79th meeting of WGFM.

We continue to believe that the usage of this spectrum with appropriate technical parameters is essential to provide a cost-effective mechanism for providing communications to smart meters, as well as a raft of other applications, including the wider "Internet of Things".

Substantive benefits can be accrued by the UK and we believe, therefore, that this valuable spectrum should be rapidly released for exploitation. By doubling the amount of spectrum available to Short Range Devices in the sub-GHz band, Ofcom will help to stimulate an important sector that, in countries where similar spectrum has been allocated, contributes to significant economic activity. We therefore support the technical proposals in the consultation.

Vodafone is aware that CEPT have undertaken thorough investigations but is keen to ensure that any threats to primary services in adjacent bands be sufficiently mitigated. The CEPT studies on compatibility with public cellular systems did not include the case in which a Network Relay Point (NRP) with 10% duty-cycle is co-sited within close proximity to a cellular base station receiver, hence the performance degradation that the NRP could introduce on a public cellular network (base station receive) has not been quantified.

Vodafone has an ongoing programme to carry out testing of technology to be used in the band and believes that the associated harmonised standard should specify tighter restrictions on spurious emissions than are currently contained in EN 300 220 for devices to be co-sited on mobile masts, and this should be a requirement of the deployment of such devices under a light licensing regime. Pending further analysis Vodafone would agree with Ofcom that NRPs should be allowed on a licenced basis, and that all requests to operate NRPs should be supported with evidence that interference and performance degradation to both voice and data of the public cellular network will be negligible.

Vodafone believes that the restriction of DC to 2.5% is appropriate for the majority of devices, but the operation of Network Relay Points at a DC of 10% will be necessary to support many applications and derive the full economic benefit of the band.

As set out in our response to the first consultation, Vodafone notes that in order to utilise this spectrum on release as part of a commercial proposition, an amendment to the established statutory instrument SI 2003/74 could additionally be required. Vodafone urges Ofcom to continue to progress this amendment concurrently with other release activities to mitigate the risk of any delay.