

Title:

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Representing:

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Chief Fire Officers Association

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What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

No additional comments

Question 1: Do you agree with Aegis?s conclusions on

congestion of current use of 420-470 MHz spectrum? Are there any other signs or areas of congestion that Aegis have not identified from their review?:

The conclusions reached by Aegis appear accurate, however fire and rescue services do not, to the best of CFOA's knowledge, appear to be struggling to operate in this band due to interference and so we see little imperative to alter the current allocation. Many FRS are also looking at transition from analogue to digital capabilities which may provide other opportunities around usage of the existing provision and which have not been considered in the current analysis. Further in the configuration table for 450-470MHz on page 19 of the consultation document there appears to be no recognition of the 462MHz frequencies (Channels 2 and 5 of fireground radio channels) that fire and rescue services currently use (mobile/handheld transmit, base receive). These two frequencies are paired with 457MHz frequencies. The 457MHz frequencies are however shown.

Question 2: Do you agree with Aegis's conclusions on the future demand and use of 420-470 MHz spectrum over the next ten years? Are there any other future uses or areas for future demand that Aegis have not identified from their review?:

Aegis have made the statement "the planned ES network (ESN) may result in the release of frequencies". Whilst this may remove the need for the spectrum currently used for the Airwave Tetra network ESN may provide the facility for replacement of existing fire and rescue fireground communications but it may be neither efficient nor cost effective to transfer that more local function and so an assumption cannot be made here around what ESN will facilitate. In essence whilst ESN may, in the future, be able to provide a useable facility for at incident communications this is specifically NOT part of the current business case. It is also worth noting that some FRS may have a need for additional channels for site specific support.

Question 3: Do you agree with Aegis's conclusions that there is not yet any UK demand for wideband services in the 450-470 MHz band (which could for example, be used to improve rural mobile coverage)? Please provide any supporting evidence for your position.:

CFOA does not have a specific view on this question.

Question 4: Have you experienced degradation in your systems? performance which you consider to be caused by continental interference in the last 12 months? If yes, what approach did you take towards managing and minimising interference?

Please provide any supporting evidence which explains the

frequency, impact, duration, time, location and cause (whether suspected or investigated) of the interference with respect to your specific sector(s):

In general this has not been an issue that has adversely affected fire and rescue service communications using the Airwave Tetra network, at incident short range radio or breathing apparatus telemetry. However whilst use of UHF for voice traffic is not expected to significantly rise there is no doubt potential for increased use for short range data transmissions. An obvious example of this would be the increasing use of breathing apparatus telemetry by services that are currently not utilising this facility and also the expanded use to transmit more data as technology in this area develops. It may also be possible that FRS begin to use the 'at-incident' provision to support short range sharing of data such as GPS to assist in local incident management.

Question 5: Is there additional information relevant to the configuration of the 420-470 MHz band that we should consider in developing our approach to its future management? Please provide any evidence to support your views.:

Many FRS are currently in the process of changing from analogue to digital UHF radios for use in 'at incident' communications. Work has already commenced, with OfCom, to consider how this can be achieved efficiently whilst maintaining effective communications. At this time this is not expected to create significant additional burden on fire and rescue services as the transition from analogue to digital devices is part of business as usual. However should this transition have already occurred and OfCom prescribed a further change then a financial burden would be placed upon services - this would need to be met for FRS to be able to comply with future requirements. It is also important to recognise that UHF provides local, 'in-building' coverage at incidents and so, dependent upon the band chosen, a move to an alternative band may adversely impact on the penetration capabilities due to the frequency.

Question 6: Do you agree with the potential solutions Aegis have proposed for managing the 420-470 MHz band to both meet the continued growth in congestion and demand from incumbent spectrum users, and to facilitate the deployment of wideband technologies? Are there any other solutions which you consider we should examine that Aegis have not identified from their review?

Please provide any evidence to support your position and reference each solution in your response as appropriate.:

CFOA does not have a particular view around the proposals, however we would wish to be assured that any work undertaken to harmonise use of the band will take account of Fire and Rescue needs and that costs associated with any proposals include any necessary funding to support FRS in relocating where this is required.

Question 7: Do you have any further comments relevant to how we might manage spectrum between 420-470 MHz? :

This band of spectrum supports risk critical operational activity in fire and rescue services across the UK. Any changes made could impact on effective emergency response and may also incur a cost for services which should be considered carefully. In particular this frequency range is used by FRS in the operation of 'at incident' short range comms and also for the highly risk critical provision of breathing apparatus telemetry data which is provided to supported safe operation of crews in very high risk environments.

Question 8: Do you have any comments on our proposed programme of work, the outcomes from which we will use to inform future decisions on how we manage the 420-470 MHz band? Are there any additional areas you consider we should explore?:

There are no further areas that are apparent to CFOA which require further exploration at this time though it may be beneficial to discuss any specific proposals at the Public Safety Spectrum Policy Group at which all three emergency services are represented.