

Consultation response

Response to the Ofcom Consultation
'London 2012 Olympic Games and
Paralympic Games.'

Background

St John Ambulance is one of the primary providers of out-of-hospital care in England and the Islands. In 2008 our 41,000 volunteers provided over 5.2 million hours of service to the community, treated over 82,000 patients and transported over 15,000 patients to hospital.

During the period of the London games St John Ambulance will continue to provide out-of-hospital care to major events outside the remit of the games including events related to the Queen's Diamond Jubilee, pop concerts and other events both in London and across the rest of the country. High quality, resilient communications is essential to manage life saving resources and ensuring that patients receive the correct treatment promptly. Any reduction in quality or capacity could have disastrous consequences to those requiring treatment and our volunteers.

In addition to the familiar first aid services at events St John Ambulance, in partnership with the British Red Cross, form the National Ambulance Reserve to the Department of Health. This agreement signed in 1993 has resulted in St John Ambulance being the primary support to NHS Ambulance Trusts during times of peak demand and during major emergencies such as the 7/7 bombings in London and the flu epidemic and severe weather during the winter of 2008/2009.

Good communications are the core element to our response during an emergency, whether it is a planned event such as the 2012 Olympics and Paralympics or an unforeseen emergency such as the floods of 2007.

Our current primary method of communication with our resources on the ground is PMR radio. It has proved itself to work well, be resilient and is relatively economical. Although St John Ambulance has strongly considered switching to Airwave the cost of replacing over 6,000 radios would be in the region of £7.2 million in the first year alone. Having not found extra funding despite lobbying Airwave Solution, the Cabinet Office and Department of Health, the organisation has decided to remain with our current PMR network.

Although we understand that the London Organising Committee of the Olympic Games (LOCOG) have indicated that Airwave radio data terminals will be available for whoever provides the out of hospital care at the games this will only be available for inside the Olympic venues and will not be able to be used for our work in supporting the inevitable increased demand placed on the London and other Ambulance Trusts resulting from the influx of spectators and athletes. The LOCOG Airwave system would also not provide St John Ambulance with communications should a major emergency occur outside one of the venues.

It is essential that the frequencies used by St John Ambulance remain resilient, without interference and operational throughout the period of the games. Ideally we would like to increase the number of frequencies we are already experiencing some difficulties when providing cover to more than one large event in London simultaneously.

Brian Rockell
Director of Operations

Consultation questions

Approach

Question 1

Do you have any comments on the three approaches we have taken to spectrum planning for the London Games?

Answer 1

We feel this approach is appropriate.

Question 2

Do you have any comments on the scope for reducing demand by using fibre–wireless networks within venues?

Answer 2

Not applicable to St John Ambulance

Question 3

Do you have any comments on the scope for reducing demand by deploying a London–wide cellular receives system?

Answer 3

Not applicable to St John Ambulance

Question 4

Do you have any other comments on the scope for demand by relying more heavily on wired communications?

Answer 4

Not applicable to St John Ambulance

Question 5

Do you have any comments on the scope for maximizing supply by using spectrum more efficiently?

Answer 5

St John Ambulance is already using its frequencies to capacity by use of CTCSS.

Question 6

Do you have any comments on the scope for maximising supply by reusing spectrum more efficiently?

Answer 6

As above, St John Ambulance uses its current Business Radio Licences and the frequency loaned by the MOD to full capacity on the London area making best use of separation using CTCSS and cannot accommodate any more traffic on its frequencies.

Question 7

Do you have any comments on the scope for maximising supply by using higher frequency spectrum?

Answer 7

Not applicable to St John Ambulance

Question 8

Would you consider using free-space optics technologies?

Answer 8

Not applicable to St John Ambulance

Assumptions and summary conclusions

Question 9

Do you have any comments on our assumptions?

Answer 9

The assumptions appear reasonable.

Question 10

Would you be willing to use LOCOG's land-radio network?

Answer 10

St John Ambulance will be more than willing to use the LOCOG land-radio network. However this system will only be used inside the Olympic venues and will not provide communications for our resources attending other events or supporting the Ambulance Trusts outside of the Olympic venues. It is therefore imperative that St John Ambulance retains, and if possible expands, its current PMR capability.

Question 11

If not how would you prefer to receive land-radio services?

Answer 11

Please see answer 10

Question 12

Would you be willing to use CTCSS tones/DCS codes to allow the same channel to be used for land-radio in both the Olympic Park and the River Zone?

Answer 12

St John Ambulance already makes full use of CTCSS to allow multiple site usage.

Question 13

Do you have any other comments on our assessment and proposals for land-radio?

Answer 13

No further comments

Question 14

Do you have any comments on our assessment and proposals for maritime radio?

Answer 14

No comments

Audio links

Question 15

Do you have any comments on our assessment and proposals for wireless microphones and IEMs?

Answer 15

Not applicable to St John Ambulance

Question 16

Do you have any comments on our assessment and proposals for talk-back?

Answer 16

Not applicable to St John Ambulance

Question 17

Do you have any comments on ADS?

Answer 17

Not applicable to St John Ambulance

Video links

Question 18

Which bands would you prefer to use for wireless cameras?

Answer 18

Not applicable to St John Ambulance

Question 19

Which bands would you be willing to use for wireless cameras if you cannot use your preferred bands?

Answer 19

Not applicable to St John Ambulance

Question 20

Do you have any comments on our assessment and proposals for wireless cameras?

Answer 20

Not applicable to St John Ambulance

Question 21

Which bands would you prefer to use for point-to-point links?

Answer 21

Not applicable to St John Ambulance

Question 22

Which bands would you be willing to use for point-to-point links if you cannot use your preferred bands?

Answer 22

Not applicable to St John Ambulance

Question 23

Do you have any comments on our assessment and proposals for point-to-point links?

Answer 23

Not applicable to St John Ambulance

Other guaranteed services

Question 24

Do you have any comments on our assessment and proposals for FSS?

Answer 24

Not applicable to St John Ambulance

Question 25

Do you have any comments on our assessment for MSS?

Answer 25

Not applicable to St John Ambulance

Question 26

Do you have any comments on our assessment for RNSS?

Answer 26

Not applicable to St John Ambulance

Question 27

Do you have any comments on our assessment and proposals for telemetry and telecommand?

Answer 27

Not applicable to St John Ambulance

Question 28

Do you have any comments on our assessment or proposals for WLANs?

Answer 28

Not applicable to St John Ambulance

Football venues

Question 29

Do you have any comments on our assessment or proposals for spectrum at the six football venues?

Answer 29

We agree with the assessment and already have good communications in these venues negating the need for extra spectrum.

Cultural events

Question 30

Do you have any comments on our assessment or proposals for cultural events?

Answer 30

We agree with the assessment and have no further comments.

Non-guaranteed services

Question 31

Do any non guaranteed public services have spectrum requirements that cannot be met through existing allocation and assignment processes?

Answer 31

As stated earlier, St John Ambulance (London, Prince of Wales District) have applied for a further Business Radio (Regional and National) licence. This has not been granted due to lack of spectrum in and around London.

Question 32

Do any non guaranteed private services have spectrum requirements that cannot be met through the market and existing assignment processes? Should we make alternative arrangements for handling such requests?

Answer 32

Please see answer 31.

Innovation and legacy

Question 33

Do you have any comments on our assessment and approach to innovation and legacy?

Answer 33

Not applicable to St John Ambulance

Question 34

Do you agree we should establish special licensing arrangements for users covered by the Government's spectrum guarantees? To what extent is your response based on what has worked well at past Games and comparable events?

Answer 34

Not applicable to St John Ambulance

Question 35

Do you agree that an online application process using the LOCOG rate-card ordering system is the best way for guaranteed users to apply for spectrum licenses? How could the licence application process be made optimal?

Answer 35

Not applicable to St John Ambulance

Question 36

How can efficient sharing and co-ordination between Games and non-games spectrum use best be achieved?

Answer 36

By ensuring users operate within their licence as described in the consultation document.

Question 37

How can the use of licence exempt equipment best be managed?

Answer 37

Not applicable to St John Ambulance

Question 38

Do you have any other comments on how best to licence spectrum use for the London Games?

Answer 38

No further comments

Question 39

How can interference management be most effective in ensuring the successful running of the London Games? Are there other measures we should consider implementing? To what extent is your response based on previous experience of similar events?

Answer 7

As per the proposals in the consultation document.

Question 40

Do you have any comments on our approach to test events?

Answer 40

No

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