Title:

Please select

Forename:

John (les)

Surname:

Griffiths

Representing:

Organisation

Organisation (if applicable):

Fire and Resilience Directorate, Department for Communities and Local Government

Email:

les.griffiths@communities.gsi.gov.uk

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:

No

I confirm that I have read the declaration:

Yes

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?:

Aegis's conclusions on congestion in this band appear accurate although this is something Emergency Services users of this band are aware of. Fire and Rescue Services have traditionally operated in analogue on their allocated frequencies however this is changing and they are utilising their channels to introduce digital technology, which can if required allow the number of channels operated in the 25KHz allocation to be increased. Although digital radio is less prone to out of band (OOB) emissions having cleaner edges it means that more channels are filling up the available space which Aegis may also wish to consider including in their view of congestion.

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?:

The conclusions drawn seem to reflect the current demand although collectively FRS are unlikely to make further requests for additional channels. However some individual FRS are likely to require additional channels for site specific communications requirements at a local level. An example of this would be London Fire Brigades need for a communications system compatible with their current handheld hardware in specific buildings in London

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.:

No response - DCLG does not monitor this position.

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).:

No reported interference.

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.:

Points for consideration-
(1) FRS operate critical communications between 450- 470MHz where 'in building' coverage is considered greater in UHF frequencies and therefore any move to alternate frequency may have a significant impact on the operational viability.
(2) Any proposed changes to FRS allocations would need careful planning as the channels required for constant use across county and Welsh and Scottish borders and would need to remain available during any transition period. FRS are responsible for the procurement, tuning and maintenance of their own hardware some of which may not be suitable to be retuned over a wider range adding cost to any reconfiguration.
(3) A programme of relocating the FRS BAT channel from 869 MHz to 469 MHz is in the final stages at a cost of circa £7.2m. This transition which has taken approx. 5 years to complete was a result of the removal of the reallocation at the previous frequency. This raises a value for money consideration of the very recent investment.

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.:

(1) The four options provided are workable solutions and would have varying degrees of disruption to FRS operations where safety of the public and Firefighters must be paramount. Considerations such as in building coverage, continuous interoperability, costs to users and stability are clear objectives in any proposed transition.
(2) The existing allocations in 420-470MHz for FRS appear to be sufficient at present and they are currently out of scope for ESMCP so there seems little latitude in considering a reduction in spectrum requirements and therefore a continued programme of management will be required. The extent of the longer term FRS future requirements is unclear while procurement of the new ES network due for roll out in 2020 continues. There are no plans at present to migrate allocations in 420-470MHz to the ESN.

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

No response

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?:

(Suggestion)All Emergency Services (ES) are represented through their lead departments at Public Safety Spectrum Policy Group (PSSPG) including Scotland and Northern Ireland. This issue has been discussed and there may be some benefit in discussing the requirements and long term management of ES spectrum directly with the subject matter experts at (PSSPG)