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**Atkins Ltd.,**  
200 Broomielaw, Glasgow, G1 4RU.  
Tel: 0141 220 2000

**TELECOMMUNICATION ASSOCIATION  
OF THE UK WATER INDUSTRY  
- TAUWI -**

**RESPONSE TO THE  
OFCOM CONSULTATION  
On  
Providing Spectrum Information  
Implementing the Environmental Information Regulations 2004**

***INTRODUCTION***

This response is provided by the **Telecommunications Association of the UK Water Industry (TAUWI)** on behalf of his members:

Anglian Water Services Ltd	Severn Trent Water Ltd
Black Sluice Internal Drainage Board	South East Water Ltd
Bournemouth & West Hants Water plc	South Staffordshire Water Ltd
Bristol Water plc	South West Water Services Ltd
Cambridge Water plc	Southern Water plc
Dee Valley Water plc	States of Jersey Transport and Technical Services Department
Environment Agency	Sutton & East Surrey Water plc
Essex & Suffolk Water	Thames Water Utilities Ltd
Hartlepool Water	United Utilities Water plc
Lindsey Marsh Drainage Board	Veolia Water Central
Logica plc	Veolia Water East Ltd
Northern Ireland Water Ltd	Veolia Water South East Ltd
Northumbrian Water Ltd	Wessex Water Services Ltd
Scottish Water	Yorkshire Water Services Ltd

Atkins Ltd act as the main point of contact for TAUWI members and represent their interests on a range of matters, including responding to strategic consultation documents on behalf of its members.

This response may be reviewed by each of the 28 member organisations that form TAUWI and therefore negates the need for submissions from individual water companies. However some members may choose to provide individual responses.

The Association was formed in April 2004 and replaces the Telecommunications Advisory Committee (TAC) which for the previous 14 years had acted as the focus

for the UK Water Industry in relation to fixed and mobile communications and scanning telemetry from a technical and regulatory aspect. The scope of TAUWI has been extended to capitalise on new opportunities resulting from emerging technologies and regulatory changes. At the same time, more emphasis is being placed on strategic issues in relation to other sectors of an organisation's operation, such as IT Systems, General Communications Infrastructure and business requirements.

TAUWI is chaired by Mr Richard Luke of Anglian Water Ltd.

The Water Industry is a major user of Telemetry Systems and employs various communications technologies, including UHF Scanning Telemetry, Public cellular (GSM, GPRS), Leased Line and PSTN to support their mission critical operation. All aspects of water management, including the recovery, treatment and distribution of water, the control and monitoring of water quality and operation of flood defence systems utilise Telemetry to ensure compliance with statutory requirements as well as reducing maintenance and operational costs. Increasing Environmental regulatory requirements increases the need for good quality and reliable information both via voice and data services. All aspects of water policy in England is the responsibility of Department for Environment Food and Rural Affairs (DEFRA). The Industry is regulated by the Water Industry Regulator, OFWAT.

The Water Industry is a major user of licensed Radio Scanning Telemetry systems which are designed and assigned to the IR 2037, VNS 2111, RA375 (previously the MPT 1411) specification.

The Industry makes considerable use of data and information in the provision of its core services and also when dealing with its many millions of Supply and Recovery domestic and business customers. The Environment Agency also make use of telemetry data as part of their flood defence management schemes.

The Water Industry has access to radio spectrum in the VHF and UHF bands. This is managed on a National Licensing basis by Atkins Ltd who act as the Spectrum Management Organisation for the UK Water Industry and some other non-water utility organisations using the UHF Licensed Scanning Telemetry Spectrum. This relationship provides the RF engineering and planning necessary to ensure that the most effective use is made of the radio spectrum. It also acts as a focus for the Industry and deals with engineering, licensing and financial matters with related Regulators and Government Departments.

The Water Industry welcomes the opportunity to respond to Ofcom's consultation on "Providing Spectrum Information – Implementing the Environmental Information Regulations 2004".

## **Responses**

**Question 1: Is there information that we are planning to release that would be covered under one of these exceptions and if so what is the supporting evidence?**

The Water Industry is very concerned that Ofcom could be forced to release site location information that they currently hold. The Water Industry, through TAUWI, has been expressing its concerns for a number of years in their responses to previous consultations for Ofcom, the more recent being the consultation on “Notice of Ofcom’s Proposals to make Wireless Telegraphy Regulations relating to Business Radio Licenses” (June 2008) and “Business Radio Trading & Liberalisation” (July 2006).

We would like to reiterate our concerns with regard to the possible release of site location information of such strategic national infrastructure. We believe that the public release of such information in the current security climate would serve the interests of subversive organisations and individuals. This information would allow the jamming of radio equipment and as such represent a commercial and security risk. As we have done in the past, we urge Ofcom and other Government Departments to consider as a matter of urgency putting in place measures to guarantee the confidentiality of the Water Industry and other Critical National Infrastructure organisations site location information.

**Question 2: Is there information that we are planning to release that would not be in the public interest to do so looking at each exception individually and then in aggregate and if so what is the supporting evidence?**

National Security:

Were such strategic national infrastructure (water reservoirs, water transport infrastructure, water treatment plants, etc...) targeted by terrorist organisations, the potential harm to the general public could be significant. On these grounds we strongly believe it is not in the public interest to release such infrastructure location information.

Also in reference to item 4.9 in the consultation document:

*“Also, some of the information is already made freely available internationally and is provided in other countries, and this information provision has not adversely affected those countries’ defence/national security.”*

We believe that the approach that consists in considering that it is acceptable to release such information because no major incident has yet been observed elsewhere is the wrong approach to ensuring the security of national assets and of the general public.

**Question 4: We are interested in the views of stakeholders on what information in addition to that contained in Annex 8 they think would help to ensure optimal use of the electro-magnetic spectrum, and on the impact the disclosure of this information might have on licence holders.**

Applicants who want to get detailed information on the electro-magnetic landscape surrounding their area of interest currently go through a single point of contact to obtain this information (Ofcom for point-to-point links, Atkins for the Water Industry Scanning Telemetry). Were such detailed information made available publicly, applicants would still have to follow the same procedures and input similar effort; it would only ease the burden of the organisation providing the information at the cost

of security as there would be no way of tracking who is benefiting from this information.

Moreover such detailed information is exactly what would be required by an organisation willing to jam specific radio transmitters/receivers, and as such represent a commercial and security risk.

We therefore have doubts on the usefulness of making such detailed information freely available.

**Question 6: Would stakeholders find information on the price paid for a traded spectrum licence useful and believe that we should make the provision of this mandatory?**

Some information on the price paid for a traded licence could for instance be of benefit to an organisation holding such licence rights but who is not making full use of these rights. Comparing the prices paid for similar licences when traded would provide an idea of the price they could expect to obtain. Such information might be of particular relevance in geographic areas of high demand.

**Question 7: If yes, what would be the most appropriate way for us to collect these data, for example asking for the specific value, using a check-box system? In what format should information be provided, for example displayed in aggregate format?**

We do not think an exact value would be required in this case but a rough estimate using a check box system for instance could be useful.

John Jennow  
Business Manager  
Communications and Systems Division  
Telecoms  
Atkins Ltd