

Consultation response form

Question	Your response
<p>Question 1: Do you have any views on our proposal to allow access to the 1910–1915 MHz spectrum for use by ESN gateways prior to 3 April 2029?</p>	<p>Confidential? – N</p> <p>ESMCP is the group within UK Government’s Home Office that is responsible for the deployment of the Emergency Service Network (ESN) to meet the future communications needs of the “blue light” emergency services. We welcome Ofcom’s decision to award the 1910-1915 MHz spectrum band to support the project. As noted, a key aspect of programme requirements is the ability to meet user or- ganisations needs with regard to coverage. Whilst 4G and, in due course, 5G coverage in the UK is much more extensive as a result of both commercial investment and public sector investment through SRN and ESN, there will be circumstances where macro network cov- erage is insufficient to meet the needs in a particular location where an incident requiring significant emergency services attendance has occurred.</p> <p>These situations will be addressed in many in- stances by the deployment of ESN coverage extension solutions, mounted in emergency service vehicles. The spectrum being granted will provide a dedicated coverage “bubble” to allow effective communications for the teams on sites where macro network coverage is ei- ther completely lacking or has insufficient ca- pacity to meet operational needs, which is clearly a vital and often life saving element of the overall ESN capability.</p>

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	<p>We welcome Ofcom’s proposal to allow ESN to use the spectrum before the expiry of the formal withdrawal notice period in April 2029. As previously noted, whilst the “go live” date for ESN and the consequent commencement of migration away from the current Airwave provided TETRA communications solution is yet to be firmed up, it is likely to be well before that date. Consequently, the earlier availability of the spectrum will allow the benefits of the coverage extension gateways, for example in helping to deal with emergencies in rural areas, to be realised sooner as well.</p> <p>We will aim to ensure, with our delivery partners, that the spectrum granted is used in an efficient and effective way to support this need.</p>
<p>Question 2: Do you have any views on our proposed licence term requiring the licensee to operate on a non-interference, non-protection basis prior to 3 April 2029?</p>	<p>Confidential? – N</p> <p>We are broadly content with the proposal to make the “ESN” licence for the spectrum to be granted on a non-interference, non-protection basis. We do have a number of issues to raise:</p> <p>Existing licensee use of the spectrum</p> <p>We accept that there does not currently seem to be any intention from the existing licensee to make use of it within the remaining term of their licence.</p> <p>However, if this position changes, given the potentially serious impact of any interference between the two licensees on “safety of life” matters, we would expect that VMo2 notify the “ESN” licensee and Ofcom of the scope and nature of any proposed use of the spectrum.</p> <p>Licence withdrawal and re-award as a result of a change of contracted parties.</p>

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	<p>As discussed and noted in the previous consultation process, given the need to periodically re-procure the contracts that will underpin ESN, the Home Office needs to understand how to deal with the situation where the current provider of RAN services might be replaced by another MNO. Whilst the statement outlines how the existing licence would be withdrawn on contract expiry, it is not clear how a new licence would be awarded in order to maintain the legality of equipment use. We would appreciate clarification.</p> <p>Access and Inspection</p> <p>EE have already rightly pointed out it may be difficult for them to secure that equipment using the allocated spectrum is promptly available for access and inspection. As has been noted above, the equipment will be mainly mounted in emergency service vehicles operated by some or all of the many organisations that provide blue light services in the UK. It may be feasible for the licensee to maintain a register of coverage extension solutions including which vehicles the equipment has been installed into where applicable, with a contact point for the relevant organisation, backed up by contractual obligations on allowing Ofcom access but we need to ensure how best to frame such arrangements in order to satisfy the licence condition.</p>

Please complete this form in full and return to 1900futureuse@ofcom.org.uk.