Your response

Question	Your response
Question 1 : Do you agree with our analysis of potential demand for the 1900 MHz band? Are you aware of any other potential demand for this spec- trum, including any demand specific to Northern Ireland?	Confidential? – No Translink does not know of any competing demands and does have any reason to disagree with your analysis.
Question 2 : Do you agree with our identification of FRMCS as the optimal use of the 1900–1910 MHz spectrum?	Confidential? – No Yes. We welcome the proposal for use of this spectrum for the railway and FRMCS, permitting use of standardised equipment and future interoperability with Irish Rail. Translink expects this band will be optimal for use in city centres and other high-traffic areas. We wish to empha- sise that we do not see it as an alternative to the 900MHz GSM-R band for overall FRMCS deployment: the GSM-R/900MHz FRMCS band must also be retained for use together with 1900MHz for effective and optimal- cost railway FRMCS coverage.
Question 3 : Do you agree with our identification of ESN Gateways as the optimal use of the 1910–1915 MHz spectrum in Great Britain? Do you agree that it is too early to identify an optimal use of the 1910–1915 MHz spectrum in Northern Ireland at pre- sent?	Confidential? – Part of the response Translink has no view on the optimal allocation of this spectrum in GB. We also have no view on its optimal use NI but would refer Ofcom to PSNI for their thoughts. However, the possibility for interference from that band impacting FRMCS would be the same in NI as it would be in GB, so Translink would not want a high-power service to operate in that band ([≫]).
Question 4: Are you aware of any low power use cases suitable for the 1915–1920 MHz spectrum?	Confidential? – No No. Translink has no knowledge/view in this area.
Question 5 : Do you have any com- ments on our proposed authorisation approach for FRMCS?	Confidential? – Part of the response We completely agree that the spectrum should be allo- cated for FRMCS railway use only.

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	An exception to this would be if Translink were to look to enter into a network sharing arrangement with another publicly-owned operator using 5G technology [≫<]. In this case capacity allocation would have to be managed to ensure ample operational availability for all users, in- cluding during degraded operation or emergency situa- tions. There are a number of issues that would need to be assessed, including the use of standard railway equip- ment and cross border service/network access. Should any other future additional use for this band be identified, for example in geographic areas where there is no possibility of rail lines being built, its primary pur- pose of serving railway operations must be maintained without risk of interference (as per Section 4.35)
Question 6 : Do you have any views on our proposed non-technical conditions for the new FRMCS licence?	Confidential? – No The conditions seem reasonable. Translink has no other views at present with regard to NI. Realistically there are no other potential railway users of the band in NI, although Translink would obviously have to coordinate with Irish Rail in border areas.
Question 7 : Do you have any views on our proposed licensing process for the FRMCS licence?	Confidential? – No The process seems reasonable (but do also see our re- sponse to Q19)
Question 8 : Do Are you aware of any uses that can coexist with FRMCS without creating a risk of harmful interference? If so, please provide evidence.	Confidential? – No Translink has not studied this area in detail but is also not aware of anything at present.
Question 9: Do you agree with our proposed approach for authorising ESN gateways in 1910–1915 MHz?	Confidential? – No Translink has no view on this / does not apply to NI.
Question 10: Do you have any views on our proposed non-technical licence terms for the ESN gateways licence?	Confidential? – No Translink has no view on this / does not apply to NI.

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Question 11 : Do you have any views on our proposed licensing process for the ESN gateway licence?	Confidential? – No Translink has no view on this / does not apply to NI.
Question 12 : Are you aware of any uses that can coexist with ESN Gate- ways without causing risk of harmful interference? If so, please provide evi- dence.	Confidential? – No Translink has no view on this / does not apply to NI.
Question 13 : Do you have any com- ments on our assessment of the coex- istence of FRMCS in 1900–1910 MHz with existing DECT and FDD uplinks?	Confidential? – No Translink has not studied this aspect but your assesment seems reasonable.
Question 14: Do you have any com- ments on our assessment of the coex- istence of ESN Gateways in 1910–1915 MHz with existing DECT and FDD up- links?	Confidential? – No Translink has no view on this / does not apply to NI.
Question 15: Do you have any com- ments on our assessment of the coex- istence of ESN Gateways in 1910–1915 MHz with FRMCS in 1900–1910 MHz?	Confidential? – No Although this does not apply to NI and Translink has not studied this aspect, your assesment seems reasonable (but please also see our reponse to Q16).
Question 16: Do you have any com- ments on the feasibility of the addi- tional mitigation measures we have identified, or additional suggestions for measures that could further re- duce the likelihood and/or impact of interference?	Confidential? – No Whilst currently n/a in NI, in general the risk of interfer- ence to stopped trains or trains in critical locations must be taken into account (including dynamically by the ESG operator). The placement of ESGs must be coordinated with the railway where there is any risk of interference impacting the railway. In extreme cases, poor placement may cause safety-related communication failure. For instance, if an event demanding the use of ESG may also cause trains to have to stop in the same area, there is a risk that a stopped train would be unable to com- municate with the signaller or signalling system due to ESG interference. It could then be stranded/unable to obtain authority to move.

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Question 17: Do you have any com- ments on our proposed technical li- cence conditions for FRMCS and ESN gateways?	Confidential? – No Translink has no further views on this point at present.
Question 18: Do you agree with our provisional conclusion that there is likely to be excess demand for the 1900–1915 MHz band, in future, if cost-based fees were applied; and, therefore, that an AIP fee is appropri- ate? Please provide any evidence to support your position.	Confidential? – No In NI, at least, Translink does not believe that AIP is the optimal solution. Translink agrees with Ofcom that rail should be the only (or first and protected) user for the 1900-1910MHz band. No other users should be able to apply for its use that would conflict with rail use in any way. In NI, Translink does not foresee any other users re- questing access to the band. In light of this, to maximise social value benefits and re- duce administrative costs, Translink – at least in NI - would request a cost-based licencing model is adopted.
Question 19: Do you agree with our approach to fees, including fee level and adjustments? Please provide any evidence to support your position.	Confidential? – No Translink will not need nor want to deploy FRMCS in the 2029 timescale and is unlikely to consider any deploy- ment or trial before 2036. Translink does, however, see retaining 1900-1910MHz for future FRMCS use as <i>essential</i> for preserving the abil- ity to run a modern railway system in Northern Ireland going forwards. We would ask that licence fees be incurred only when FRMCS is deployed, and not just for reserving the FRMCS spectrum allocations. All costs, and their administration, contribute to an inflationary effect on railway ticketing or, in the end, have to be recovered from DFI funding.