

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

TETRA Association

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

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1: Demand and supply of services:

A clear demand for further development of emergency service radio (Public Protection and Disaster Relief - PPDR) has been shown and documented in various analysis results:

- Analysys Mason report "Public safety broadband and spectrum needs" March 2010
- German Ministry of Economy study (by WIK Consult and Aegis) and presentations to ECC and EU RSC etc
- EU PPDR Workshop report from March 2011

All these results conclude that there is a need to develop PPDR services towards high speed data and broadband radio access. For proper quality of service, both dedicated networks and also dedicated radio spectrum, are required.

It should also be noted that even if the EU PPDR workshop tried to create dialogue concerning spectrum sharing between military and PPDR spectrum users, there is no such working dialogue currently in place in Europe and hence such sharing ideas remain only

theoretical for the moment. This is one reason why the PPDR community needs to seriously look at opportunities like the UHF spectrum, to be able to meet their ongoing obligations. In UK the service agreements with Airwave are expiring within the next ten years and something new is needed.

2: Technological developments:

The mobile operator community and industry are investing or planning to invest into LTE technology to produce mobile broadband services in volumes. In the U.S. the administration (FCC) has already made a decision to select LTE as the Public Safety radio technology in the 700 MHz Public Safety band(s). The current view among the European PPDR user community is that synergies with the ongoing LTE investments should also be utilised in Europe.

In ETSI a broadband standardisation work item has been started within TC TETRA to produce standards to meet the requirements of PPDR and other mission critical PMR users.

3: International developments:

In the U.S. the Digital Switchover process has already identified spectrum at 700 MHz dedicated for Public Safety services. Subsequently this spectrum was specifically identified for the broadband services of Public Safety. There is also an ongoing process in the U.S. Congress to further expand the 700 MHz broadband Public Safety allocation.

In Europe during the last couple of years, CEPT has tried to identify broadband spectrum for PPDR services based on a System Reference Document produced by ETSI but has not so far achieved anything concrete.

4: Benefits to citizens and consumers:

The value of law enforcement, firefighting or emergency medical services cannot easily be measured with generated revenues or other such financial metrics. However the existence of such value to the whole society is obvious and recognised. It is actually crucial. One attempt to quantify the value of emergency services in monetary units was made in the study of the German Ministry of Economy mentioned earlier.

We would welcome any further numerical analysis in this area to convert the benefits to numbers.

5: Future timescales:

The European timescales of potential 700 MHz spectrum restructuring likely depend very much on other factors than PPDR needs. In UK there is obvious need to find a PPDR spectrum solution in good time before the expiry of the Airwave service contracts.

6: Additional comments:

The industry serving the PPDR radio users has operated and will most likely continue to operate in an environment that offers only limited sales and delivery volumes compared to other mobile industries. The 700 MHz frequencies would allow a unique opportunity to align spectrum between North America and Europe and these improved economies of scale would bring substantial benefits to both the industry, to the customers and to the governments who

have to finance the services.

We would also very much welcome the inclusion of the PPDR user needs in the context of the expected UHF or 700 MHz related agenda item and discussion in WRC-2016.