Ofcom 800 MHz and 2.6 GHz Competition Assessment and Award Proposals

Telecare Services Association Position

The TSA is a membership organisation supporting equipment suppliers and service providers of Social alarms and Tele-Health monitoring services in the UK to around 1.7m people who are either frail and elderly, receiving long term medical care under supervision at home, or have special needs for monitoring and alarm services.

The majority of the alarms in use today are enabled by a short range RF link in the 169MHz or 869 MHz bands. This can take several forms but is frequently integrated into a neck worn pendant or wristband. These are relayed to response call centres using conventional fixed line or GSM dial up services.

The industry expects to migrate current services in time onto IP based links, 'always connected' equipment which has real longer term advantages for both the service provider and service consumer in terms of the range and quality of services that can be offered. In the same time frame some convergence between Social alarm and telehealth care services is also expected, although the communication requirements of the services are quite different.

TSA welcomes and supports the development of ubiquitous broadband services as an important enabler to expected changes in its industry sector. At the same time the requirements for a reliable and always available upload capability are essential for these services to develop, more important for these services than a broadband download capability. Our requirement to be able to support medium quality real time video is at least highly desirable and our ability to support two-way VOIP speech of good quality along with a limited data upload on demand is essential. Download capacity generally is of lesser importance to the current services. Service availability is key.

However TSA is also concerned that due diligence be undertaken to understand the risks associated with desensitisation and interference with existing alarm equipment operating in the 869 MHz band. As all current equipment is proprietary, but nevertheless compliant to EN 300-200 standards for Class 1 receiver design, quantification of the risks and the extent of the impact and mitigation of issues could prove to be a difficult undertaking. TSA also has concerns about the migration of services onto the unlicensed Wi-Fi and ZigBee standards based equipment because of the expected future demands and service take-up and the consequential increase in unregulated spectrum reuse by this equipment in high density areas.

TSA members have a continuing requirement for a low power, robust, short range communication link capability. Significant long term advantage to the UK industry is foreseen by moving towards a standards based approach to the use of the allocated spectrum. For these reasons TSA would welcome the support of Government to the Telecare industry and cooperation in developing an appropriate technical solution with a view to standardisation, which would be interoperable (able to coexist) with the proposed reallocation of the 800MHz spectrum. Ideally this would be phased in alongside the introduction of 800MHz services and as existing equipment is replaced.