



UNION INTERNATIONALE DES CHEMINS DE FER
INTERNATIONALER EISENBAHNVERBAND
INTERNATIONAL UNION OF RAILWAYS

INFRASTRUCTURE DEPARTMENT

Mr Mark Austin
Mobile Services Spectrum Team
OFCOM
Riverside House
2A Southwark Bridge Road
London SE1 9HA
UK

Paris, October 29, 2009

Dear Mr. Austin,

UIC, as the representative of the railway community worldwide, has made representations to CEPT over a number of years to obtain additional frequencies in the 900 MHz band close to the harmonized GSM-R frequencies. This approach is based on theoretical and practical experiences coming from early European implementations of GSM-R.

As you may know, GSM-R is the railway telecom bearer service at national and international level. The first attempt in 1989 to get an allocation of exclusive frequencies in the 900 MHz band was based on theoretical exercises and concluded with the agreement of CEPT to have 4 MHz in uplink and downlink for railway-only use.

The actual experiences in several European countries have subsequently proven that 4 MHz will not be sufficient in the future, when all foreseen railway applications will be in place. With this in mind, CEPT has now agreed to change the existing European ECC decisions (02)05 and (04)06, and have allowed railways to ask for additional 3 MHz in the uplink and downlink, should they require it. You might have seen that these decisions have been agreed in the July meeting of ECC. This means that railways can now officially ask their national Frequency Authority to reserve the frequency range 873 – 876 MHz paired with 918 – 921 MHz as additional frequencies for GSM-R and to treat GSM-R with priority, if other possible candidates like RFID and SRD also ask for such frequencies.

It is important to appreciate that railways applications for additional frequencies should not be treated in a pure commercial way, by comparison with Public Mobile Operators. GSM-R is a bearer service for safety related and safety applications and has to provide a high availability, an excellent reliability and services that are not required in public networks.



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UIC anticipates that the additional 3 MHz in uplink and downlink shall be used in the future in the following fields:

- national telecom applications for railways, not affecting interoperability
- some railway applications in congested areas (railway territory – defined as railway station, track, shunting yard)
- migration path towards next generation in the period where the two systems have to work in parallel (e.g. GSM-R and LTE).

UIC and the railway community have therefore a vital interest in having the frequency range 873 – 876 MHz paired with 918 – 921 MHz also reserved in UK, to allow also the potential future interoperability and a clear migration path towards the next generation of railway communications systems.

The relevant ETSI GSM standards and EIRENE specifications are being developed to include this frequency range for the railways, as well as the EU directive for ERTMS including the relevant Technical Specifications for Interoperability (TSIs).

We hope, these explanations will be taken into consideration, when evaluating the responses to the related UK public consultation.

With best regards,

A handwritten signature in black ink, appearing to read 'Gerard Dalton', is located below the 'With best regards,' text.

Gerard Dalton,
UIC, Infrastructure Department Director