



European Commission
Directorate-General for Communications Networks, Content and Technology
Electronic Communications Networks and Services Directorate
Spectrum - Unit B4

BU33 07/55
B-1049 Brussels/Belgium

6th March 2013

Dear Sir,

RE – Spectrum Workshop 01/03/2013 - Governmental users

Thank you for the opportunity to participate in the Spectrum Workshop last week. I believe that this was a very valuable opportunity for the different stakeholder groups to discuss the spectrum needs in open forum.

Our Association was particularly interested in the subjects of PMR and PPDR. At this time we are working hard to drive the development of a single common standard for the Broadband needs of Critical Communications Users world-wide and encourage a close relationship with 3GPP who are responsible for the development of the LTE standard. Our objective is to include additional functionality into the LTE standard to meet these needs of these users.

Critical Communications includes

- Public Safety – including Police, Ambulance, Fire and Rescue services
- Military and Paramilitary
- Utilities – including Gas, Electricity and Water
- Transportation – including Rail and Metro, Buses and Trams, Ports and Airports
- Fuel and Petrochemical
- Mining

Although the workshop looked at some of these sectors separately we believe that a common standardised technology offers the best possible solution in the future and this is the basis of our current work in the LTE standards domain. We also believe that the present documented spectrum need for PPDR services should be given high priority.

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Whilst the TCCA does represent the needs of a variety of Critical Communications users in the Standards work we recognise that the different user groups have made separate representations into the Commission's project for additional spectrum for their own needs. We would be happy to discuss opportunities for the efficient use of spectrum for all Critical Communications Users should the Project team so desire.

Many of our users were present at the workshop including Public Safety representatives from several European nations along with representatives from the Utilities and Rail sectors.

During the meeting the TCCA made several contributions that we have included below for your convenience.

Kind regards,

A handwritten signature in black ink, appearing to read 'Philip A.F. Godfrey', written in a cursive style.

Philip A.F. Godfrey
Chairman

c.c. Analysys Mason Project Team

From Hans Borgonjen – Vice Chairman of TCCA and Chair of Law Enforcement Working Party Radio Communications Expert Group.

My name is Hans Borgonjen and I am representing the Radio Communication Expert Group (RCEG) from the Law Enforcement Working Party (LEWP) within the Justice + Home Affairs structure from the European Union Council.

Here today are PPDR colleagues from Norway, Sweden, France, Germany, Belgium, Netherlands.

I like to make some remarks on slide 53+54:

The Radio Expert Group made several official inputs to the frequency work for PPDR:

- *A Matrix with requirements based on all Public Safety applications*
- *Operational scenario's to explain PT49 the way PPDR is working + for the cooperation with ETSI*
- *Frequency statement from the Law Enforcement level to ECC, CEPT-FM + PT49, supported by all countries, asking for a harmonised Broadband frequency band*

The Law Enforcement Radio group works very close together with PT49 and we are happy with the Report A result, being adopted by CEPT-FM, with "a minimum of 2x10 MHz for the terrestrial network" (but this is without DMO, AGA, ad-hoc networks + 'voice over the Broadband network').

From Jeppe Jepsen – TCCA Board member and Director International affairs, Motorola

On slide 56 the conclusion seem to say that Until LTE networks can support mission-critical group communications, existing networks will remain - leading to a lower spectrum demand in the long term. It is true that existing networks will remain, but I would like to challenge the conclusion that spectrum needs is less in the future. LTE will be the technology - yes - but on dedicated harmonised spectrum - not on commercial spectrum. So the demand indicator should be ++.

From Phil Godfrey TCCA Chairman

I believe that the case has been made quite clear that Public Safety and PPDR users need access to Mobile Broadband services. The LEWP/RCEG work has already established the user requirements in considerable detail and this is being worked on by CEPT FM 49.

However, I would like to concentrate on the slide referring to switching to Commercial services.

We expect that there will be a role for Commercial cellular in PPDR, at least as a temporary solution. However, Public Cellular Operators are commercial companies. They are subject to changes of ownership, changes of business emphasis and limiting investment to the minimum necessary.

PPDR users are responsible for the health, safety and security of the citizens of Europe and they need certainty in the availability and quality of their mobile communications.

Imagine that the UK public safety agencies use O2 for all their communications. What happens if O2 is bought by a Russian oligarch who wants to reduce infrastructure in rural areas to improve profitability?

I would also like to point out that it is generally accepted that growth in broadband data traffic will outstrip capacity over the next 5-10 years. It is already proven that, in times of major incident, public systems become overloaded. That is when PPDR users need the system most.

It is essential that PPDR has certainty in its access to spectrum and for that reason the demand is for dedicated and harmonised spectrum.