



Commission for
Communications Regulation

Third Party Business Radio

Re-Opening The Scheme for Licensing

Non-confidential responses received

Submissions to Consultation 15/63

Reference: ComReg 15/109a

Date: 13/10/2015

An Coimisiún um Rialáil Cumarsáide

Commission for Communications Regulation

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27/07/2015

Licensing Operations

Commission for Communications Regulation

Abbey Court

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Lower Abbey Street

Dublin 1

Dear Sir or Madam:

I refer to your consultation document ref. ComReg 15/63 in relation to the re-opening of the Third Party Business radio scheme for licensing.

I have pleasure in responding as follows;

Q. 1 – Do you agree with ComReg’s proposal to reduce the number of available VHF channels from 20 down to 10? – It is very difficult to argue against the reduction from 20 to 10 channels based on the current level of demand; however I feel that if the UHF channel allocation is oversubscribed there will be a demand for VHF channels as an alternative.

Q. 2 – Do you agree with ComReg’s proposal to make an additional 10 UHF channels available for TPBR licensing should there be sufficient demand? – I would agree with ComReg’s proposal to make an additional 10 UHF channels available. If there is sufficient demand channels should be made available – spectrum is the lifeblood of organisations in the radio communications industry.

Q.3 – Do you agree with ComReg’s proposals for the application process for the granting of new TPBR licenses? – I would agree with ComReg’s proposals for the application process as it is fair and equitable.

Q.4 – Do you agree with ComReg’s proposal not to impose a cap on the amount of spectrum/number of licenses that can be awarded / granted to any one applicant? –

I do agree with this proposal, if there is a demand from one or more applicant for additional channels they should be made available provided they are being used as intended under the scheme.

Q.5 – Do you agree with ComReg’s proposal to close the TPBR licensing scheme once all the channels are assigned or until 31 December 2017? – I do agree with this proposal as it fair and equitable.

2 ESB Networks



**ComReg Consultation on Third Party
Business Radio – Re-opening the scheme for
licensing**

ESB Networks Response

Status: Final

Date: 29/07/2015

ESB Networks Response to ComReg Consultation Document 15/63

ESB Networks (ESBN) welcomes the opportunity to respond to the Commission for Communications Regulation (ComReg) consultation in relation to the proposed reopening of the Third Party Business Radio licensing regime¹.

Radio spectrum is a hugely important natural resource, enabling both critical and non-critical services to be deployed and made available for all citizens. It is a key enabler for provision of wireless services which in turn generates significant economic, technological, social, environmental and safety benefits.

ComReg Questions

Q. 1 Do you agree with ComReg's proposal to reduce the number of VHF channels for TPBR from 20 to 10? Please give reasons for your answer.

ESBN agrees with ComReg that it should not unnecessarily reserve spectrum for a service in the event that initial demand is less than supply. Should demand be greater than 10 VHF channels at application stage and less than 20, ComReg should consider matching supply of VHF channels with the demand.

Q. 2 Do you agree with ComReg's proposal to make an additional 10 UHF channels available for TPBR licensing should demand for spectrum exceed supply? Please provide reasons for your answer.

ESBN agrees with the principle of supplying sufficient spectrum to meet the demands of users where possible.

ESBN is aware of a New Work Item (NWI) within ETSI to, insofar as possible, harmonise the use of 452.5 – 457.5 MHz paired with 462.5 – 467.5 MHz (also known as LTE Band 31) spectrum for Utility applications. Bearing this in mind, ESBN recommends that ComReg should initially assign spectrum outside this 2 x 5 MHz range. In the event that ComReg requires access to spectrum within this 2 x 5 MHz range to satisfy demand, ESBN recommends that ComReg assign spectrum accordingly to ensure the largest possible contiguous block of spectrum remains for usage by other services.

Q. 3 Do you agree with ComReg's proposals for the application process for the granting of new TPBR licences? Please provide reasons for your answer.

ESBN agrees with ComReg's proposal.

Q. 4 Do you agree with ComReg's proposal not to impose a cap on the amount of spectrum/number of licences that can be awarded / granted to any one applicant? Please provide reasons for your answer.

¹ <http://www.comreg.ie/fileupload/publications/ComReg1563.pdf>

ESBN considers it important that some cap is placed on the number of licences available to any given applicant during the application process. In the absence of a cap, there is the potential for one licensee to acquire all the spectrum and hold other applicants to ransom with regards accessing services over this spectrum. The likelihood of this occurring is low, however ESBN considers it prudent to apply some sort of spectrum cap to ensure that the possibility is entirely removed. This spectrum cap would only apply during the initial application period and only in the event that supply did not meet demand. If channels remained unassigned after application process, these should be available on a first come first served basis without any spectrum cap applying.

Q. 5 Do you agree with ComReg's proposal to close the TPBR licensing scheme once all the channels are assigned or until 31 December 2017? Please provide reasons for your answer.

ESBN agrees with ComReg's proposal, assuming that the commencement date for accepting licences is November 2015. That gives approximately a two year period which is sufficient for interested parties to submit applications. If all channels are assigned before December 2017, then there is no other logical option but to close the TPBR scheme. It is prudent to review the operation of the scheme periodically in order to assess its operation and to allow for any changes in technology to be taken on board.

END

3 Mobile Radio Networks Ltd.

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“Submission re: ComReg 15/63”

28-7-2015

With reference to you proposals I would like to put forward our response:

Ref Q1. We currently have no operational use for VHF and as such have no opinion/objection to the number of frequencies held for TPBR in that band being reduced.

Ref Q2. We would expect to be looking for some more frequencies to be allocated to us in the next implementation of the TPBR scheme. Therefore I would welcome the addition of the extra frequencies as I would expect most parties currently using the TPBR system (and new licensees) to look for more frequencies to cover the expansion and extra requirements of clients.

Ref Q3. We would be in favour of the current issued frequencies being re-issued prior to any drawing of lots for any remainder frequencies as the problems arising from frequencies being removed from current users (unless they wish to forfeit their frequencies) would be very costly and incur various other problems for changeover.

It should be borne in mind that equipment could be in any part of the country and it could take some time to change over frequencies and have equipment re-tuned.

Ref Q4. We would agree that no cap need apply as long as there is no “stockpiling” of frequencies by any user. Some companies have a greater requirement/demand for frequencies than others and as such putting a limit on the number may impede a company’s development and or expansion service to clients.

Ref Q5. We would see no problem with the closing date for applications as long as those applying later do not impinge on licences issued prior to their application. Some companies may not be aware immediately of the availability and it would be prudent to allow a fair chance for both them and existing companies who may win new contracts to apply after they have renewed their current assignments.

Many thanks for this opportunity to put our views forward.