



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Response to Consultation on re-opening the Third-Party Business Radio scheme

## Non-Confidential Submissions to Document 20/44

### Submissions to Consultation

**Reference:** ComReg 20/76s

**Version:** Final

**Date:** 20/08/2020

## Submissions Received from Respondents

Document No:	20/76s
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Consultation:	20/44
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# 1: ESB Networks ('ESBN')



Energy for  
generations

Networks Telecoms, ESB Networks

# **ESB Networks' response to ComReg's Consultation on Third Party Business Radio - Consultation on re-opening the Third Party Business Radio scheme (20/44)**

01/07/2020



## 1. INTRODUCTION

ESB Networks (ESBN) welcomes the opportunity to respond to the Commission for Communications Regulation (ComReg) consultation on Third Party Business Radio Licencing.

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

## 2. ESNB Response

ESBN is responding with comments on sections of interest below, labelling each section with the relevant paragraph number from ComReg's consultation document.

### 2.1 Response on Chapter 2

Paragraph 8

ESBN notes that the TPBR radio licences are issued under the Wireless Telegraphy (Third Party Business Radio Licence) Regulations 2005 (S.I. No. 646/2005), which states that TPBR licences shall be of five years duration and shall then expire. The electrical infrastructure and services that ESBN uses our existing TBBR licences to support is in service for 20 years or more. ESBN preference is for the TPBR licences to be issued on a longer term, more comparable with the use case. As ComReg can appreciate, there is an initial capital investment in setting up new services in the 450 MHz spectrum bands (equipment costs, rigging costs, backhaul costs, service integration etc.). The business case to deploy new services can sometimes be challenging when there is only clarity that the licence will last for 5 years. ESBN looks forward to ComReg's upcoming review in this area as it will assist ESBN and others in making key strategic investment decisions to best utilise the available spectrum.

### 2.2 Response on Chapter 3

Paragraph 14

ESBN agrees with ComReg that given the trends, it makes sense to limit the number of VHF channels it makes available. However, ESBN believes that should demand exceed supply, ComReg should immediately review the number of channels available and attempt to provide additional channels to meet demand.

#### Paragraph 17

ComReg states that since the TPBR licencing last closed in 2017 a number of parties have expressed interest in additional UHF channels. It may be that an additional 10 channels will not satisfy the current demand. If this proves to be the case, ComReg should immediately review channel availability and attempt to make additional UHF channels available to meet demand. ComReg's proposal to initially make 10 additional channels available is agreeable, however ESN encourages ComReg to be flexible when demand is understood and attempt to satisfy demand with additional channels if required.

### **2.3 Response on Chapter 4**

#### Paragraph 20

ESBN strongly supports ComReg's proposal that incumbent TPBR licensees would retain existing channels, where validly applied for, in the new licence grant process. This would eliminate unnecessary costs and disruptions for all licensees. This condition is necessary in order to minimise the cost borne by all electricity users in Ireland.

#### Paragraph 21

ESBN will need to provide our customer with continuity of the services with the existing TPBR licenses ESN uses. Provided this proposal on the transition to new TPBR licenses by ComReg will enable this, it is acceptable to ESN.

#### Paragraph 22

The proposal of "circa one month" to prepare licence applications is noted. This should prove acceptable. The ability to submit licence applications on-line would be helpful and ease the application process. Is this something that ComReg can facilitate for this licence application process?

#### Paragraph 23

ESBN does not have an issue with this paragraph at present, however if in the future demand for channels in this TPBR licensing scheme exceeds supply, then this issue should be reconsidered.

Paragraph 24

ESBN notes that the proposed 5-years TPBR licences may be valid up to November 2027 or a number of months beyond this date.

In the case that ESNB renews licences and perhaps acquires additional channels in late 2020, will it be possible to obtain new 5-year licences in late 2022 and relinquish licences acquired for the same channels in 2020? This would allow for the possibility that all licences in the TPBR scheme would co-terminate in 2027. This option would allow for more efficient use of spectrum, as it is unlikely that ComReg could use the available channels in the short term (2025 – 2027) for anything else, whereas a licensee could provide services for this additional time (paying additional fees). ESNB believes that ComReg should facilitate this proposal.

**ENDS**



## 2: Apex Radio Systems Ltd

Ms Sinead French  
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Your Ref: Ms Sinead French

Our Ref: ComReg2044\_Response

Date: 23/06/2020

Dear Sinead,

REF: **SUBMISSIONS TO COMREG 20/44** marketframeworkconsult@comreg.ie

May I firstly thank you for your communications to Apex Radio Systems Ltd.in which you have advised of the Final version of the Consultation on re-opening the Third Party Business Radio scheme. Ref ComReg 20/44

Apex currently hold (qty1) UHF Third Party Licence Ch ID TBU-43 which will expire in June 2021.

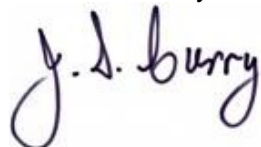
We wish to be able to hold the same licence frequencies under the new proposals, as any change to existing channel frequencies would entail significant engineering time, costs and logistical geographical disruption to our customers using the current radio channel.

We are very happy with the general content of the ComReg proposals as detailed within the above document on the provision that Apex could be re-issued with the existing radio channel frequencies.

Trusting that this is in order I would be grateful for further written clarity from you as to what we need to do now, or in the near future, prior to licence expiry date, to conform and align to the new arrangements within your re-opening proposals.

I wish to thank you in advance for your guidance in this matter

Yours sincerely



J.S.Curry I.Eng.,M.I.E.T.

Managing Director  
Apex Radio Systems Ltd.

## **3: Radiotrader Ltd**

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15<sup>th</sup> June 2020

Ms Sinead French  
Commission for Communications Regulations  
One Dockland Central  
Guild Street  
Dublin 1  
Ireland, DO1 E4XO

Ref: Submissions to ComReg 20/44

Dear Ms French,

In response to the ComReg Third Party Business Radio consultation on the re-opening of the TPBR scheme.

As a relatively new business to the Irish market we are currently being hindered as we are unable to access the TPBR licences. We have approached current licence holders to see if they will potentially sell their licences so we can get a foothold in the market. Unfortunately, we have been unsuccessful.

[✂]

[REDACTED]. So that we can provide a comprehensive offering, we will require 2 UHF duplex radio channels.

[✂]

[REDACTED]. We will require 2 VHF duplex channels in order to facilitate our client bases licencing requirements.

Kind Regards  
Simon Hampson - Director