



Dear Mr. Carrascosa,

Please find the position of the European Utilities Telecoms Council (EUTC) in response to the public consultation of draft ECC Report 276 attached.

We have no further comments to the document.

Your sincerely,

Dr. Andreas Breuer,

Chairman of the EUTC Board of Advisors



EUTC Response to the public consultation of draft ECC Report 276: "Thresholds for the coordination of CDMA and LTE broadband systems in the 400 MHz band"

The European Utility Telecom Council (EUTC) would like to express its support for the approach offered in draft ECC Report 276 for coordination between users of the 400 MHz band in Europe in border areas with different narrowband, wideband and broadband systems.

The EUTC represents various different utilities throughout Europe who are currently using, or intending to use the 400 MHz-band for 'Utility Operations'. 'Utility Operations' describes the essential elements for the monitoring and control of gas, water and electricity networks to ensure the reliable, sustainable and secure delivery of vital utility services to government, businesses and citizens throughout Europe.

The thresholds defined in Report 276 for coordination take into account both incumbent (often narrowband or wideband) usage whilst simultaneously offering possibilities to move to broadband (LTE) communication techniques on either side of a border based on current knowledge. The proposed coordination thresholds offer efficient solutions to optimize the spectrum usage for narrowband, wideband and broadband systems and allow for actual usage in border areas.

However, we must note that the proposed new coordination thresholds define parameters for partial overlap of narrowband and wideband assignments across a border, not the case where there may be full overlap between disparate systems. Utilities require coverage right up to the border on each side to safeguard critical infrastructure in border regions, which in some cases may be serving cross-border links in pursuance of European Energy policy objectives.

The EUTC puts itself at the service of the ECC in sharing the output of projects currently under way within utilities in Europe to explore situations where there is full overlap between narrowband and wideband systems operating in the same area or close proximity in a utility context. The EUTC anticipates results of current projects being published towards the end of 2018.

The EUTC compliments the ECC for the outcome of this work item which manages to strike a good balance between all types of users on either side of a border at the present time.



The European Utilities Telecommunication Council

The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.

This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.

Contact

European Utilities Telecom Council (EUTC) Avenue Jules Bordet, 142 - 1140 Brussels - Belgium

Tel: +32 2 761 16 59 – www.eutc.org

Email: eutc.org