



**Proposed 400 MHz Band Spectrum Award  
Draft Information Memorandum and Draft Regulations  
Reference: ComReg 19/56 Release of the 410 – 414/420 – 424 MHz sub-band**

EUTC

The European Utilities Telecom Council (EUTC) is a non-profit organization delivering education, collaboration, best practices and thought leadership in telecommunication technology to utilities, other critical infrastructure providers and regulators, ensuring efficient, secure, sustainable and affordable smart infrastructure solutions.

The membership is comprised of major gas and electricity transmission and distribution companies from across Europe plus vendor partners representing telecommunications suppliers focused on utility telecoms provision.

ESB Networks is one of EUTC's members and will therefore respond directly to the questions posed by the Irish Commission for Communications Regulation (ComReg).

Background

EUTC welcomes ComReg's proposal to release 2 x 4 MHz of spectrum in the 410-430 MHz band to provide smart grid services within Ireland.

Since our comments on previous ComReg consultations on use of the 400 MHz band, the most notable international development has been the publication of the International Panel on Climate Change (IPCC) Special Report on Global Warming. Published on 8 October 2018. The report stated that limiting global warming to 1.5°C would require rapid, far reaching and unprecedented changes in all aspects of society. The IPCC said that "With clear benefits to people and natural ecosystems, limiting global warming to 1.5°C compared to 2°C could go hand in hand with ensuring a more sustainable and equitable society"<sup>1</sup>. Smarter electricity grids will play an indispensable part in attaining that goal, within which advanced telecommunications will be an essential ingredient.



We also note that ETSI System Reference Document SRDoc TR 103 492 (Critical Infrastructure Utility Operations Requirements) has also now been approved for publication.

Against this continuing background of international progress towards more intelligent networks and lower carbon societies, ComReg's consultations on release of spectrum in the 400 MHz sub-bands are progressive and far-sighted.

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<sup>1</sup> [https://www.ipcc.ch/pdf/session48/pr\\_181008\\_P48\\_spm\\_en.pdf](https://www.ipcc.ch/pdf/session48/pr_181008_P48_spm_en.pdf)



## General comments

With the publication of the 'Response to Consultation and Decision on the 400 MHz Band Spectrum Award: Consultation and Decision: Reference: ComReg 19/69' on 28 June 2019, there is little merit in repeating previous comments. Overall, ComReg is to be congratulated on their far-sighted decision to reserve spectrum in the 410-430 MHz band, recently incorporated into Frequency Range 1 for 5G, for utilities and public safety.

## Specific comments

Our comments are restricted to those areas of greatest importance and relevance to utilities generally, rather than the specifics of the Irish environment which are best left to more local responders.

### Developments within the European Conference of Postal and Telecommunication Administrations

- With the adoption of ECC Decision (19)02, ComReg's change of approach to this spectrum release at a relatively late stage means that utilities will not have the flexibility to enlarge their spectrum block to encompass 2 x 5 MHz should analysis show this to be the optimum structure for a combined utility telecom network in the process. However, utilities do not rule out the concept of innovative sharing models whereby in the future, public safety and utilities might wish to explore opportunities for sharing spectrum, networks and associated services.
- It is commendable that utilities in Ireland have been given the opportunity to focus on the 410-430 MHz band for LTE technology as it is unlikely that 450-470 MHz will be available in Ireland in the foreseeable future. As an aside, the proposal aligns well with the approval by 3GPP in June 2019 of LTE bands 87 and 88 (410-430 MHz) and the recent conclusions of working group FM54 covering the same frequency range.



### Memorandum of Understanding

- International co-ordination will be a priority as utilities have to provide service to the very edges of the Republic of Ireland's border. However, in the case of utilities, networks share resources on a cross-border European-wide basis with regulation on a European basis. It is often quoted that radio waves do not respect international borders, but the same is true of wind, water and sunlight. EUTC and its members are therefore at ComReg's disposal to assist in international co-ordination of use of radio spectrum by utilities wherever EUTC can be of help. Specifically, EUTC encourages spectrum harmonization and co-ordination on a European basis to facilitate lowest cost solutions and enhance Europe's industrial strengths, and wishes to support the Irish Administration in their endeavors in this direction wherever possible.

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