Main points

EUTC has responded to previous consultations about the 450 MHz-band in the Netherlands. We will not repeat these arguments, but EUTC welcomes the decree as it indicates that the Ministry has carefully considered responses from those consultations and has made changes to reflect these considered views.

EUTC is always available to assist in any way possible with the implementation of this decree, especially international aspects as we recognize that all European nations do not follow the Harmonised European Band Plan for spectrum in the 450-470 MHz band, and this can give rise to cross-border interference, especially under anomalous propagation conditions caused by certain weather patterns.

Detailed points for consideration

- EUTC welcomes this decision and believes that it provides the right conditions for growth of smart grid applications in the 400 MHz UHF spectrum bands. Being aligned with the international trend to assign 3GPP based spectrum to providers of mission critical private networks, often for utilities to support the energy transition, it will encourage the development of a competitive ecosystem for smart grid applications. This will benefit energy consumers through the availability of more price competitive and feature-rich products from which utilities can build their operational networks. It will also enable the connection of more renewable energy sources to the electricity networks through the availability of enhanced monitoring and operational control facilities.

- EUTC notes that this decision will provide a bandwidth of 2 x 3 MHz which is most welcome. However, we observe that many utilities believe that a minimum of 2 x 5 MHz of spectrum will be required to service both smart grid and smart metering applications. We also note that 5G standardization may be based on a minimum channelization of 5 MHz. We recognise that at present the allocation of 2 x 5 MHz may not be readily achievable. However, it is important to highlight this fact for future considerations in the event that circumstances change, and an enlarged allocation becomes possible.

- As we discussed above, we note that these standards for smart grid applications must be progressed through the 3GPP processes. This is essential, but extremely onerous and resource intensive. Any assistance in this task by the Dutch Administration, especially adding their support in the 3GPP process for utility applications would be warmly welcomed.
Furthermore, EUTC, in collaboration with other global utility telecoms associations is progressing a report on ‘Utility Radiocommunications Systems’ through the International Telecommunication Union Radiocommunications Sector (ITU-R) Study Group 5. Specifically, in Working Party 5A subgroup 3 (WP5A-3), several national administrations have contributed to an annex describing national radiocommunications services for critical utility operations. It would be helpful to the wider international community if the Netherlands Administration could add a contribution to this Annex explaining developments in the Netherlands.

With the Netherlands moving forward with the deployment of an advanced 3GPP based system for critical utility operations in the 450-450 MHz band, co-ordination will be required with other administrations. EUTC would like to offer assistance for any direct utility to utility co-ordination as utilities already collaborate closely to deliver reliable and cost-effective services to consumers in border regions, and exchange services through interconnectors to enhance the efficiency of the overall European market. This not only potentially reduces costs for consumers, but also supports energy flows across borders to aid reduction of CO2 emissions.

A special situation occurs with the international border across the English Channel as the UK does not conform to the Harmonised European Band Plan. This gives rise to enhanced interference to UK utility radio monitoring and control systems during times of anomalous propagation caused by unusual weather patterns. Since EUTC has members on both sides of the English Channel and North Sea where the problems are greatest, EUTC has a unique opportunity to assist in the mitigation and resolution of any problems which arise.

**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.

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