



Response by the European Utilities Telecoms Council to Anatel Public Consultation No44

The European Utilities Telecoms Council (EUTC) represents European electricity and gas generation, transmission and distribution companies, some of which are also active in the Brazilian energy market. We are offering our advice based on our knowledge of global utility activities in the hope that it will be helpful to the Brazilian Authorities.

As utilities around the world seek to support the UN Climate Goals to reduce the emissions of harmful greenhouse gases and plan to mitigate the effects of climate change on energy network, it is essential to improve the monitoring and control of the energy networks. This can only be achieved by applying more advanced and extremely resilient telecommunications with high availability and low latency. High data-rates are less important to utilities than wide-area geographic coverage and good reliability.

The most efficient and effective way in which to implement these critical operational telecommunications networks is using radio spectrum below 1 GHz because of its unique propagation characteristics. Private networks are required as public networks do not deliver the required coverage and performance characteristics, especially resilience. Licensed spectrum is required to guarantee immunity from interference.

Globally, as identified in the work Radiocommunication Sector of the International Telecommunication Union (ITU-R) Working Party 5A, utilities are focusing on spectrum in the 400 MHz bands with LTE becoming the preferred technology. Bandwidths in the region of 2 x 3 MHz to 2 x 5 MHz are generally being allocated as sufficient for current needs, although this may need to be increased as look towards adoption of 5G technology in utilities from about 2030 onwards.

Our observations are that although Public Consultation No44 does not preclude utilities from acquiring contiguous blocks of spectrum for private LTE networks, it does make it difficult to do so. In addition, the structure of any commercial offering of spectrum may facilitate speculators to acquire small slices of spectrum to block the acquisition of the wider bandwidths suitable for LTE.

EUTC also notes that some of the bands in Table VI do not align with the preferred bands identified by 3GPP (Third Generation Partnership Project). This could delay deployment of systems and potentially make them more expensive and less flexible than if the spectrum bands could be aligned to 3GPP bands.

EUTC is always available to contribute more information if that would be helpful to the Brazilian Authorities.

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