



**DCMS - Statement of Strategic Priorities for
Telecommunications, the Management
of Radio Spectrum and Postal services**

Response on behalf of European Utilities Telecom Council

Introduction

The EUTC welcomes the opportunity to respond to the DCMS consultation on draft SSP in relation to telecommunications, management of radio spectrum and postal services.

The European Utilities Telecom Council (EUTC) is a professional association for telecommunications, technology and cybersecurity specialists working within utility, energy and critical infrastructure sectors. It brings industry experts together from across Europe, enabling them to share knowledge and stay up to date in this rapidly changing field. The EUTC works in partnership with EU institutions that actively seek its opinions on important issues such as spectrum allocation and development of the future energy grid. EUTC members include National Grid and Scottish Power in the UK along with a number of other innovative European Utility companies. EUTC also has close alignment with the Joint Radio Company (JRC) in London, who manage radio spectrum on behalf of the UK utility sector.

EUTC is broadly in support of the aspirations outlined in the SSP and is encouraged by the approach taken by DCMS in preparing the draft statement of strategic priorities. EUTC believes there are some additional areas which should be identified for focus within the SSP. These elements are explained further in our responses to the two questions posed in the consultation.

**Do you agree with the Government's strategic priorities and desired policy outcomes
for telecommunications, the management of radio spectrum and postal services?**

The intention of DCMS to enable advanced gigabit connectivity through widespread fibre deployment and world class 5G networks is to be commended. The issues identified around both physical construction of these networks and challenges in gaining associated planning permission and legal agreements with landowners and local authorities are familiar to the electric, gas and water utilities. The 'barrier busting' approach to facilitate quicker more cost-effective solutions to implement these networks will significantly benefit the UK in becoming a world leader in digital industries.

In parallel to the digital evolution which is affecting a wide range of sectors including education, entertainment, social media and artificial intelligence, there is also an evolution taking place in the utility sector. This change is being largely driven by demands to reduce the carbon emissions generated through electricity production and transportation based on combustion of hydrocarbons. These advances in low carbon technology will bring about enhancements for the whole of society.

Telecommunications networks and their associated data centres, fibre connections and base stations all rely on a robust and reliable electricity supply in order to function. In turn, electrical utility networks require more complex, dedicated telecommunications systems to monitor and control a large number

of new devices and plant throughout a wide geographic area. As large centralised generating stations close, the diversity and distribution of electricity generation is increasing significantly and becoming far more dynamic in its nature. The UK has developed an enviable reputation for harnessing renewable energy resources (especially wind) having just completed construction of the world's largest off-shore facility (The 'Walney Extension' located in the Irish Sea with a capacity of 659 MW) and subsequently commenced construction of an even larger project in the North Sea (Hornsea Windfarm – planned capacity 1,200 MW). This increasing reliance on dynamic renewable energy coupled with the anticipated uptake in electric vehicles, grid storage and demand-side control of domestic white goods will increase the scale of utility telecoms networks by several orders of magnitude.

It is the opinion of EUTC that within Section 3 of the consultation (***Secure & Resilient Telecoms Infrastructure***), reference should be made to ensure that adequate provision is made for the provision of a modest amount of dedicated radio spectrum for use by the electric, gas and water utilities (namely 2 x 3MHz in the 400 MHz UHF region). This is a common approach in many other EU countries who have already embraced the concept of a 'smart grid' and are beginning to see evidence of the socio-economic benefits which such an approach can deliver. The need for secure and resilient telecommunications networks is inextricably connected with the need for a secure and resilient electricity supply.

Does this document set out clearly the role of Ofcom in contributing to the Government's strategic priorities and desired outcomes?

The EUTC agrees that the proposed approach for Ofcom in contributing to the government's aspirations is fair and balanced. In particular, the areas around social inclusion across all members of society is essential in order that we do not create (or exacerbate) a digital divide. The provision of services should be largely left to a combination of incumbent players and innovative new entrants governed by market forces. Intervention through policy mechanisms and / or subsidy should only occur where it is essential. (It is interesting to note that one of the current 5G innovation projects being delivered by Strathclyde University is focusing on a 'rural first' approach to 5G implementation).

EUTC notes the aspiration for near-ubiquitous coverage (95% geographic coverage) including rural areas and the entire road network. EUTC believe that a specific mention should also be made within the SSP of connectivity in the rail network (over ground and underground) – which represents a specific use case and has very particular technical challenges. In common with the utility sector, the rail network requires both mission critical communications for safe and reliable operation of train services. For rail, this is coupled with a need for enhanced passenger connectivity to facilitate both social and work-related activities. This area has previously been explored through consultations by the Department for Transport. Improvements in passenger experience on the UK rail network are frequently identified as crucial in reducing the number of journeys made by road, and also increasing productivity of business travellers whilst making journeys from place to place.

Increased focus on cyber security and sharing of best practise through collaborative engagement is essential in mitigating the risks brought about by increased connectivity of critical infrastructure. The EUTC and global partners in UTC (USA), AUTC (Africa) and UTCAL (Latin America) work closely with centres of excellence in cyber security to ensure the protection of critical national infrastructure from malicious and unintended cyber events. It is positive that the SSP recognises this as an area for attention.

The SSP indicates an interest in possible utilisation of utility assets as part of the deployment of full fibre and 5G networks – especially in connection with the anticipated ‘network densification’ required for effective 5G coverage. EUTC is aware of previous studies by the National Infrastructure Commission in 2016 / 2017 which explored the potential for road, rail and utility assets to become more widely used as part of future telecoms networks. EUTC agrees that this is a sensible area for further discussion – especially considering the existence of a readily available power source at many locations and fibre optic transmission capability at some sites. An exercise to examine the methods by which this sharing of assets could be safely achieved would be required as would an outline of any commercial arrangement for such an approach. Note that EUTC’s wider membership (outside the UK) includes utility companies who already supply both telecommunications and energy services to consumers. The knowledge and experience of those organisations could be useful for discussions in the UK.

EUTC appreciate that the Statement of Strategic Priorities is currently a draft. We would welcome the opportunity for further engagement and development of Strategic Priorities.

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