



EUTC Open Letter to

The Chairmen of CEPT ECC SRD-MG and ETSI TC ERM TG28

CEPT Consultation on ERC Recommendation 70-03 - Draft annex 2

To: Mr. Andrew J. Gowans
Chairman, SRD/MG

And: Mr. Philippe Magneron
Chairman, ETSI TG28

Network Access Point (NAP) restrictions in the 870 – 874.4 MHz band

Dear Sirs

We have been following closely the work in which CEPT and ETSI have been engaged on the topic of Network Access Points (NAPs) in the band 870 – 874.4 MHz. You will observe from our EUTC Spectrum Proposal that the 870-876 MHz band forms part of our proposal -for access to spectrum to facilitate roll-out of smart grids in Europe.

Devices in this band are of potential value to many organisations in the utilities sector which comprises private sector, government and state-owned companies. Release of this spectrum across the whole of Europe has potential benefits for European consumers. Many countries have released large amounts of this spectrum and the recent EC Decision (2018/1538/EU) has mandated the release of a proportion of this spectrum. Placing unjustified restrictions on devices operating in this band could seriously jeopardise its value to utilities and undermine its worth.

We are particularly concerned about the phrase, 'under the control of a network access point', especially if this requirement is associated with the entire 870-874.4MHz band in Rec 70-03, as we set out in our response to your consultation on the update to Annex 2.

We are aware that the exact interpretation of phrase will be discussed at the special workshop on 11 June 2019. May we use this letter to emphasise the importance of the

<i>EUTC Spectrum Proposal</i>
<i>Within Europe, multiple small allocations within harmonised bands:</i>
LESS INTENSE APPLICATIONS <ul style="list-style-type: none">• VHF spectrum (50-200 MHz) for resilient voice comms & distribution automation for rural and remote areas. [2 x 1 MHz]
ANCHOR BAND <ul style="list-style-type: none">• UHF spectrum (400 MHz bands) for SCADA, automation, smart grids and smart meters. [2 x 3 MHz]
MORE DENSE APPLICATIONS <ul style="list-style-type: none">• Lightly regulated or licence-exempt shared spectrum for smart meters and mesh networks. (870-876 MHz)• L-band region (1500 MHz) for more data intensive smart grid, security and point-to-multipoint applications. [10 MHz]
FOUNDATION BANDS <ul style="list-style-type: none">• Public microwave bands (1500 MHz – 58 GHz) for access to utilities' core fibre networks/strategic resilient back-haul.• Public satellite bands to complement terrestrial services for particular applications.



outcome of this meeting; an overzealous interpretation of the phrase will undermine the confidence that utilities have in using the band. In a worst case, it might prevent deployment of technologies which would benefit utility customers and society in general. We are particularly concerned about the impact of the need to accommodate switching off the telecoms devices, as telecommunication services will be transforming operations in utilities, and eventually become instrumental elements of the critical electricity service delivery. It will be totally unacceptable for utility operations.

We hope these views can be taken into account at your Workshop.

Background

Operational communication capability is increasingly important for utilities driven by the demands of Smart Grid developments. To enable Smart Grid developments, more and more European utilities are pursuing access to spectrum to complement fixed telecommunications networks. Dedicated wireless communication systems enable a range of critical communications within the Grid's operation requirements, improving connectivity to all assets and allowing energy utilities to exert a level of control over their network assets that can be guaranteed and is both robust and resilient. In addition, critical utility operational networks must incorporate cyber-security measures capable of withstanding sustained attacks from hostile nation-states.

Traditionally, electricity networks have been one-way systems to deliver power from large centralised generation sources into a transmission grid at high voltage, and then distributed to customers at low voltage.

The current challenge is to accommodate large numbers of intermittent sources of renewable generation connected into the distribution networks at their extremities where the power infrastructure is at its weakest; whilst at the same time reducing 'customer minutes lost' by increasing the reliability of the network.

The European Utilities Telecom Council (EUTC)

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 DETAILS:

European Utilities Telecom Council, Avenue Tervueren 188a, Postbox 4, 1150 Brussels, Belgium

Tel: +32 2 761 16 59; email: eutc@eutc.org

www.eutc.org