

Úrad pre reguláciu elektronických komunikácií a poštových služieb	
Dátum 07 -02- 2018	
Podacie číslo:	Číslo spisu:
Prílohy/listy:	Vybavuje: <i>RS</i>



OSFS pr. 17.



promoting the advancement of 450MHz worldwide.

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Mr. Vladimír Kešjar
Chairman

Úrad pre reguláciu elektronických komunikácií a poštových služieb
Továrenská 7, P.O. BOX 40
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January 27, 2018



Dear Mr. Chairman,

I am writing you on behalf of the 450 MHz Alliance in response to the recent public consultation on the future use of the 450 MHz band¹. Although the deadline for comments has already passed, we believe it is appropriate to share our views on the usage of the 450 MHz band for wideband communication systems based on 3GPP standardized technologies, and also to raise a concern regarding the positioning of the 2x5 MHz block as proposed in the consultation document.

The 450 MHz Alliance is an industry association that represents the interests of 450 MHz spectrum stakeholders. Our members include traditional wireless industry companies such as wireless license holders, carriers and major equipment manufacturers, as well as companies representing various vertical markets for machine-to-machine communication. The 450 MHz Alliance strongly believes in the potential of the 450 MHz spectrum and advocates harmonization and standardization in this field.

Broadband networks (with channel bandwidth > 1 MHz) can be found world wide and their number is increasing. Where traditionally these networks were based on CDMA technology, more and more operators introduce LTE450 technology, with channel bandwidths of 1,4 MHz, 3 MHz or 5 MHz.

Due to the radio propagation characteristics at 450 MHz, nationwide coverage can be achieved with a limited number of sites. Such networks are well suited to customers that require good (indoor) coverage and only moderate bitrates. We typically see that LTE networks in the 450 MHz band are used for:

- Resilient and secure machine-to-machine communications for business and mission critical services, and/or
- Mobile communications in rural areas

For example: in several countries, electricity grid operators use such networks to monitor and control the smart grid and smart meters and to secure voice communications for the field service in case of major power outages (blackouts). LTE450 based communications are also suitable for Smart City, Smart Mobility, Smart Industry and Smart Health applications. The 450 MHz Alliance firmly believes the assignment of 5 MHz spectrum to LTE450 based networks may yield an impetus for innovations throughout Slovakia.

Concerning the spectrum arrangement foreseen in Slovakia, the 450 MHz Alliance wants to express a concern related to the misalignment with the 3GPP defined E-UTRA bands:

¹ „Verejná konzultácia o budúcom využívaní frekvencií vo frekvenčnom pásme 450 MHz“ – published on 19 December 2017

- Band 31: 452.5 - 457.5 MHz / 462.5 - 467.5 MHz
- Band 72: 451 - 456 MHz / 461 - 466 MHz

Band 72 was only recently introduced and is intended for broadband PPDR, PMR and PAMR operation in Europe².

The 450 MHz Alliance wants to underline that the 2x5 MHz block proposed by the Regulatory Authority (451.50 - 456.50 MHz/461.50 - 466.50 MHz) is not fully in line with Band 31 or Band 72. This will impact the ability of the prospective spectrum holder to fully benefit from the 3GPP standardized bands in terms of network deployment and availability of both network technology and CPE's from vendors. In fact, in order to fully use the potential of the 2x5 MHz block, the spectrum holder would have to apply customized technology. A choice for a 3GPP standardized band would definitely support efficient utilization of spectrum.

In addition, Band 72 was introduced primarily for the European market because current spectrum assignments in many European countries did not fully match with Band 31 and do fit within Band 72. From the perspective of European harmonization and to simplify cross border coordination agreements, we strongly recommend the Regulatory Authority to align with this development and to assign Band 72 for wideband communications, rather than the frequencies as mentioned in the Public Consultation document.

Given the reasons outlined above, the 450 MHz Alliance would invite the Authority to explore a possibility to re-adjust the proposed block to match the standardized and broadly adopted Band 72. Even if such option is not feasible immediately or on a short-term, we believe it would be desirable to consider a re-farming of the adjacent bands such that alignment with Band 72 could be achieved in the near future.

Dear Mr. Chairman, the 450 MHz Alliance remains at your disposition for any further questions. Should you have any questions, please do not hesitate to contact either me or my colleague Daan Beaufort.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Igor Virker'.

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² Details of the 3GPP work item can be found in TR 36.748 (<http://www.3gpp.org/DynaReport/36748.htm>)