

***Network Rail Response to UK Defence Spectrum Management Consultation:  
“An Implementation Plan for Reform” - September 2008***

*Question 1. Do you agree that the MOD has identified the options and factors that MOD should consider before deciding whether or not to extend the audit of the spectrum it uses?*

Network Rail Response: *No opinion.*

*Question 2. Do you have any views on the priority with which MOD should audit its spectrum use?*

Network Rail Response: *No opinion.*

*Question 3. Do you agree with the phased approach to applying for RSA that the MOD is proposing?*

Network Rail Response: *No Opinion.*

*Question 4. Do you agree with the MOD’s plans for releasing and sharing the spectrum it uses?*

*Network Rail Response: DSM’s consultation document references the UIC GSM-R spectrum 876-880/921-925MHz recently vacated by MOD which Network Rail is legally obliged to employ to achieve European Interoperability. This spectrum was the subject of an extended programme of modelling and measurement to which MOD were party. From this work MOD DSM will be aware of the mission critical nature of Network Rail’s operational communications systems; an example quoted in the dialogue being radio interference to GSM-R causing the delay or prevention of the primary means of emergency communications between train driver and signaller; perhaps contributing to an unsafe event. Future deployment of interoperable in-cab signaling over Network Rail’s GSM-R system would also see similar radio interference resulting in delays to train services.*

*Network Rail request DSM to apply the same stringency of assessment to the potential impact of spectrum redeployment upon Network Rail’s operational communication systems as it would to its own mission critical communication and navigation systems.*

*If DSM are considering the evaluation of alternative sharers for the UIC GSM-R spectrum, Network Rail believe that only the extensive level of analysis applied to*

*understanding the implications of Ptarmigan/GSM-R co-existence would be appropriate to ensuring that no additional risk would be imported to the GB railway infrastructure. DSM are urged to ensure that their spectrum re-deployment plans fully account for the cost and timescale implications for all affected parties conducting such an exercise.*

*Question 5. Do you agree with MOD's priorities for releasing and sharing spectrum?*

Network Rail Response: *No Opinion.*

*Question 6. Do you agree with MOD's outline timetable for initial spectrum releases?*

Network Rail Response: *No Opinion.*

*Question 7. Do you agree that MOD has correctly and fully identified the factors and options that should be considered before deciding to release and acquire spectrum in the market?*

Network Rail Response: *See response to Question 4.*

*Question 8. Do you agree that MOD has correctly and fully identified the factors and options that should be considered before deciding the best means with which to interact with the market?*

Network Rail Response: *No Opinion.*

*Question 9. Can you identify any different approaches for the MOD to manage the spectrum it uses and engage with the market to deliver better value for money for defence and the taxpayer?*

Network Rail Response: *No Opinion.*

*Question 10. Which options (from paragraph 6.7) should be considered, or discounted, and if so why; either in respect of options already identified in section 6, or additional options, not identified?*

Network Rail Response: *No Opinion.*

*Question 11. Which issues relating to section 6 should be considered when evaluating options, and if so why; either in respect of issues already identified in that section, or additional issues, not identified?*

Network Rail Response: *No Opinion.*

*Question 12. Is the scope of decisions required against each of the four questions at paragraph 6.3, as indicated in section 6, sufficient and, if not, how and why it should be extended?*

Network Rail Response: *No Opinion.*

**END**