INSTITUT LUXEMBOURGEOIS
DE RÉGULATION

RÉSULTAT

DE LA CONSULTATION PUBLIQUE DU 16 SEPTEMBRE 2019 AU 18 OCTOBRE 2019 RELATIVE AU PLAN D'ALLOTISSEMENT ET D'ATTRIBUTION DES ONDES RADIOÉLECTRIQUES (PLAN DES FRÉQUENCES)

LUXEMBOURG, LE 23 OCTOBRE 2019

SERVICE FRÉQUENCES

Le présent document reprend les contributions transmises à l'ILR dans le cadre de la consultation publique du 16 septembre 2019 au 18 octobre 2019 relative au plan d'allotissement et d'attribution des ondes radioélectriques (Plan des fréquences).

L'Institut a reçu une contribution de la part de la société Itron Inc.

18 October, 2019

Institut Luxembourgeois de Régulation
L - 2922 Luxembourg

Dear Sir/Madam

Itron is delighted to comment on the proposed changes to the Plan des fréquences proposed by ILR on 16 September 2019. Itron's interest lies in operations in the 870 and 915MHz bands and the EU Implementing Decision (EU) 2018/1538, and with that in mind we have the following observations and suggestions:

1) Removal of non-specific short-range devices in the frequency bands 874-876 MHz and 915.2-920.8 MHz will cease on 1 July 2020 in the consultation preamble

We note ILR's intention here and agree that future deployments of any SRDs are – at least temporarily – suspended above 874.4 and 919.4MHz, respectively. Nevertheless, entries for this class of device remains in Rec 70-03 (h2.0 & h3.1) and so might usefully remain in the bands 870-874.4MHz and 915-919.4MHz. In fact, inspection of the detail of the document suggests that this operation ***is*** to be allowed, although some errors have been made (see 3), below).

2) Withdrawal of Interface Specification A5 13 (TTT)

We note this withdrawal and support its removal

3) Withdrawal of Interface Specification A1 41 (Non-specific Short range Devices with a duty cycle of up to 1%)

We do not believe that wholesale removal of this Interface Specification is justified or necessary, and we believe, in fact, that the wrong Interface Specification is planned to be removed. Earlier versions of Rec 70-03 (eg 5 October 2018) contained two similar and partially overlapping entries in this band: h2 and h2.1, allowing 0.1% and 1% duty cycle, respectively. Removal of A1 41 and leaving A1 40 will have the effect of imposing a limit of 0.1% for these bands (from a previous limit of 1%), which we do not believe is the intention.

We would suggest, therefore, that Interface Specification A1 40 be withdrawn and Interface Specification A1 41 remain intact (with its Frequency band altered to 870-874.4MHz).

4) Creation of new Interface Specification A2 04.1 (Tracking, Tracing and Data Acquisition)

We note that a new Interface Specification, A2 04.1 is proposed to be associated with the harmonized band 874.0-874.4MHz and run in parallel with the existing Interface Specification, A2 04. We believe that this is likely to lead to confusion and is unnecessary.

By creating a second specification, it will not be clear what duty cycle applies to the band 870-874.4MHz – 2.5% for each sub-band or 2.5% across the entire band (which is the spirit of the regulation)? We do not believe that there will be any conditions that apply to one sub-band and not the other, therefore we believe that Interface Specification, A2 04 could simply be updated with the Frequency band altered to 870-874.4MHz).

5) Creation of ***two*** new Interface Specifications A2 09 and A2 10 (Tracking, Tracing and Data Acquisition)

These two, non-contiguous sub-bands are associated with a single entry in Rec 70-03 (c3) which have a joint duty cycle limit. It would make sense, therefore, to combine them into a single Interface Specification with a Frequency band of '917.3-917.7 MHz & 918.5-918.9 MHz'.

We trust that you will accept these suggestions in the spirit of cooperation and would be happy to discuss the details if that would prove useful.

Your faithfully

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