



PSC Europe

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**PSCE Letter in Response to Report
"Is Commercial Cellular Suitable for
Mission Critical Broadband?"**

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PSCE Letter in Response to Report “Is Commercial Cellular Suitable for Mission Critical Broadband?”

Dear Mr. Forge¹,

With respect to the report „Is Commercial Cellular Suitable for Mission Critical Broadband“, the PSCE (Public Safety Communications Europe) Forum expresses its concern about the general outline of that report.

Statements which show the soon upcoming end of lifecycle of today’s PPDR-TETRA networks are especially incorrect, as many European countries at the moment are in the roll-out phase of their TETRA networks (e.g.: Austria, Germany, Italy, Norway, Slovenia, etc.). Therefore it is to be expected that those networks will be in operation for several more, probably 15+ years - until 2030 and beyond.

But also in other European countries, mission critical broadband communications – be it via commercial, dedicated or hybrid network solutions – will not or not within short time, replace their narrowband voice communications networks (TETRA, TETRAPOL).

This is not only due to the necessary ROI, but also due to the fact that 4G networks and technology in their first phase(s) are planned to be data centric networks and some key PPDR requirements will not be fulfilled, as they need to be standardised first.

So the implementation of mission critical broadband data communications will be in parallel with today’s narrowband mission critical voice communications. Only at a later stage, voice communications will experience a transition into LTE networks, when TETRA and TETRAPOL networks need to be de-commissioned.

These facts, especially the focus on the view on hybrid network solutions of TETRA/TETRAPOL plus dedicated PPDR-LTE plus commercial LTE are missing in your report.

Our most serious concern with respect to the use of commercial networks is the lack of security, redundancy and resilience in the planning and implementation of commercial networks. Therefore in our view, your overall conclusion is not clear enough, not strong enough. PSCE proposes to change the statement – as also already discussed in the presentation meeting earlier this month:

“Our overall conclusion is that it is NOT possible to use commercial networks for mission critical purposes, UNLESS five conditions are met.”

¹ Mr. Simon Forge is Director of SCF Associates Ltd.

PSCE is also very strongly demanding dedicated spectrum for the use of mission critical wireless broadband communications – no matter if at the end of the day PPDR are using a commercial, a dedicated or a hybrid network solution. The main reason for this is the requirement of reliability and availability of communications channels, no matter what amount of traffic is occurring in the “commercial side” of non-mission critical networks and the requirement of worldwide cooperation of PPDR forces in everyday cross-border incidents as well as global disaster relief.

PSCE strongly repeats the message already communicated in the presentation meeting: “What we are looking for in the report is a new kind of MNO who puts social responsibility over shareholder value and acts like the service providers for dedicated TETRA networks (e.g. ASTRID) combined with additional commercial services. It is questionable if this is possible. PPDR users need to be in control of their communication network therefore they need dedicated spectrum that they can give to an MNO – not vice versa. It is not understandable why the hybrid solution (integrating TETRA, dedicated broadband and commercial broadband) is assigned a very high cost and is said to be not feasible.”

As PSCE has contributed to the comments of their partner, the Tetra and Critical Communications Association (TCCA), PSCE is fully in support of their statements sent to you separately.

The Public Safety Communication Europe Forum (PSCE) is a permanent autonomous organisation aiming at improving provision of public safety communications and information management systems and the safety of the citizens during crisis and emergency situations. PSCE provides a unique common platform for researchers, industry and users enabling regular exchange of ideas, information, experiences and best practices.

PSCE is representing over 120 institutional and individual members that are users, industry organisations and researchers working in the area of public safety communications.

With best regards,

Harold LINKE,
President of PSCE

Marie-Christine Bonnamour,
Secretary-General of PSCE

Public Safety Communications Europe
www.psc-europe.eu