



## **European Utilities Telecoms Council**

### **Response to the Consultation NFP-wijziging PAMR-band by the Netherlands Administration on spectrum awards in the 450 MHz band**

**September 2022**

#### **Main points**

EUTC has responded to previous consultations about the 450 MHz-band in the Netherlands, so we will not repeat these arguments again, even though the Ministry of Economic Affairs and Climate Policy has chosen to split the 2 x 3 MHz into two blocks of 2 x 1.5 MHz which we believe will ultimately be unsuccessful. PAMR services have been launched in a number of European countries in previous years without a great deal of success, and we believe the mobile market is even more unfavourable to this type of service now than in previous decades.

However, our specific comment on the consultation published on 12 August 2022 is that a licence term of ten years is too short to generate any likelihood of success. Our reasoning is two-fold:

- Constructing a network of sufficient maturity and with characteristics sufficient to tempt customers to switch from the existing mobile network operators (MNOs) will take several years. Private Access Mobile Radio (PAMR) customers will wish to see a proven network before contracting to take service, further increasing the period between the award of the licence and the ability of the licensee to generate revenue.
- PAMR customers are professional users and will look to make investments for a 15-20 year period. In most PAMR applications, the professional grade communications hardware will be integrated into some form of operational equipment such that the cost of the installation is comparable or several times greater than the cost of the communications device itself. In addition, the cost of taking operational equipment out of service while communications equipment is fitted incurs disruption costs. Utilities are unlikely to make investments in a PAMR service if there is a risk that it may lose its licence after ten years, forcing the user to make unscheduled replacements and creating stranded assets.

#### **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.

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