Response to the consultation to make a market investigation reference by the CMA on the mobile radio network for the police and emergency services

- The CMA's proposal to make a market investigation reference in respect of the mobile radio network for the police and emergency services should be strongly supported and implemented as a first step in learning what mistakes have been made which have resulted in the current situation and the unsatisfactory market situation which has existed for many years as well as making recommendations or interventions to improve the situation in the short term and establish improved institutional arrangements for the next generation of technology.
- Public international standards such as 5G from 3GPP represent an opportunity to enable
 widespread competition for the procurement of interoperable system elements from
 different suppliers allowing regional replacements for the national Airwave system with
 different contract end dates, but with full roaming between regions for system users.
- Where 3GPP has placed insufficient emphasis on interface standards for the various system
 elements a national and even international standards body should work to produce
 specifications to enable the reliable delivery of the services needed by different emergency
 services, consistent interoperability between different network operators and terminal
 equipment and stable interfaces with other systems used by users and which rely on the
 network for communication.
- Just as the standard setting bodies like 3GPP have a rolling and public programme for the
 development of new technologies, the Government should have a rolling programme of
 planned requirements, standards, specifications, trials and procurements for all the various
 system elements to encourage suppliers and network operators to compete on a rolling
 basis, instead of being dependent on very difficult procurement situations every time the
 national contract runs out.
- Providing very different service levels and functionality required by emergency services,
 utilities and transportation systems over public commercial radio networks presents very
 real and difficult challenges. A full, detailed and published evaluation of this proposal by a
 fully qualified and independent body should be a requirement before any recommendation
 is made by the CMA, to avoid the risk of any recommendation for the future of this market
 including an element which would not work in practice.

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