Mobile Radio Network Services Market Investigation

Motorola's Fourth Supplementary Submission to the CMA's Oral Hearing on 10 February 2022

11 March 2022

1.   Introduction and Summary

(1)   Following the Oral Hearing on 10 February 2022 (the "**Hearing**"), Motorola wishes to make this brief submission in response to Ms [✂]'s request for evidence of Motorola's efforts in promoting ESN to end users:

"[✂]." (emphasis added)[1]

2.   Motorola's promotion of ESN

(2)   Firstly, Motorola notes that as explained by Mr [✂] during the Hearing, Motorola has been requested by the Home Office not to approach end users directly and therefore any promotion of ESN is done in a manner "[✂]".[2] As such, Motorola emphasises that its ability to promote ESN to end users is largely limited by, and at the request of, the Home Office.

(3)   Nevertheless, Motorola sets out in this submission the main instances in which Motorola has actively engaged in the promotion of ESN.

2.1   Motorola's promotion of ESN at BAPCO conferences

(4)   BAPCO conferences (https://www.bapco-show.co.uk/) are major annual events in the field of critical communications and public safety, at which Motorola has participated on multiple occasions as part of the Home Office's ESN exhibition stand, including on the following instances:

(a)   Motorola participated in and demonstrated the very first ESN communications at the BAPCO conference in **March 2018**.[3] Motorola's attendance at, and assistance with, this demonstration was reported by Critical Communications Review which explained that "*Motorola Solutions supported the demo with a specially developed App for ESN's core services: PSX Cockpit*". [4] In addition, following Motorola's participation at the BAPCO conference, Motorola's executive vice president, Kelly Mark, publicly expressed that Motorola is "*proud to support the Home Office on its new delivery approach for ESN*".[5]

(b)   Motorola attended the BAPCO conference in **March 2019** and actively supported the Home Office's ESN exhibition stand. At the time the ESN PSCS system was not available, and as such, Motorola demonstrated the operation of Kodiak from Motorola's commercial WAVE On Cloud system.[6]

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[1] Oral Hearing Transcript dated 10 February 2022 at lines 9 – 13, page 91 and at lines 13- 18 at page 92.

[2] Oral Hearing Transcript dated 10 February 2022 at lines 14 – 25, page 91.

[3] The ESN demonstration can be found at the following location: https://vimeo.com/263318696/a1cdb9b6d1

[4] Critical Communications Review, '*ESN First Live Demo at Bapco 2018*', found at:
https://www.criticalcommunicationsreview.com/ccr/news/96236/uk-esn-first-live-demo-at-bapco-2018

[5] Motorola Solutions Press Release dated 21 September 2018, found at:
https://www.motorolasolutions.com/newsroom/press-releases/motorola-solutions-reaches-agreement-with-uk-home-office-to-implement-esn-p.html

[6] Motorola Solutions Youtube video dated 21 March 2019, *Motorola Solutions Kodiak Broadband Push-To-Talk at BAPCO/CCE2019*, found at: https://www.youtube.com/watch?v=QqF4ooyfvns

(c) Motorola attended the BAPCO satellite conference in **November 2019** and actively supported the Home Office's ESN exhibition stand. At the time the ESN PSCS system was not available, and as such, Motorola demonstrated the operation of Kodiak from Motorola's commercial WAVE On Cloud system.

(d) Motorola attended the BAPCO conference in **March 2020** and actively supported the Home Office's ESN exhibition stand. In addition, Motorola's employees presented the ESN Self Service Portal and the Kodiak PSCS at a Home Office ESN seminar hosted at the conference.

2.2 <u>Motorola's promotion of ESN through presentations at various events</u>

(5) In addition to attending and supporting ESN at the BAPCO conferences, Motorola has promoted the ESN network at multiple events, including in the following instances:

(a) Motorola visited the Scottish Emergency Services and delivered an ESN briefing directly to user representatives in **April 2019** and **September 2019**.

(b) Motorola delivered an ESN briefing and demonstration to the [✂] in **July 2019**.

(c) Motorola supported the Home Office at the [✂] test events in London in **December 2019**.

(d) Motorola supported the Home Office exhibition stand at the 5 [✂] Roadshow events on **11 November 2019**, **21 November 2019**, **10 December 2019**, **9 January 2020** and **20 January 2020**. During these events, Motorola provided ESN PSCS demonstrations and answered general ESN queries from attendees.

(e) Motorola supported the Home Office exhibition stand at the Law Enforcement Portfolio Show and Tell event at the Windsor Suite in the [✂] Centre in **February 2020**. During this event, Motorola provided ESN Roadmap explanations and demonstrated Kodiak to visitors.

(f) Motorola supported the Home Office exhibition stand at the Emergency Services show at the London [✂] Centre in **April 2020**.

(g) Motorola has provided crucial support to the Home Office through their engagement in multiple working groups[7] including, most prominently, the User Interface/User Experience Working Group (the "**Working Group**") from **2018 onwards**. This Working Group is comprised mainly of ESN User Representatives with support from Home Office's technical staff and Motorola's User Engagement team. Motorola's main role in the Working Group has been to enable a direct engagement between the end-user representatives on all matters related to the ESN service and the use and operation of the Kodiak product. In particular, Motorola's engagement commenced immediately following the signature of CR0329 when Kodiak was not fully understood within the Home Office or by its end-users. Motorola's efforts in this respect have included giving numerous presentations and demonstrations of the Kodiak functionality as and when required by the Home Office. In fact, the Working Group's forum has been acknowledged by the Home Office as being highly effective specifically due to the proactive engagement of the

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[7] For example, the Application Interface, Application Experience (AIAX), and Operational Configuration Working Group (OCWG). These key working groups met on a frequent (i.e., daily, weekly) basis to ensure that ESN users understood how Kodiak and related systems worked, all with a view to ensuring that the Home Office's transition would be ready.

Motorola User Engagement team. Further, Motorola notes that this active and essential effort has been made outside of any contractual obligation.

2.3   Other instances of Motorola's promotion of ESN

(6)   Further, Motorola has actively used its own platforms for the promotion of ESN, including in the following instances:

   (a)   Motorola's promotion of ESN through its new product portfolio where ESN is described as a "*new emergency services network*" which "*will transform public safety in the UK*".[8] This promotion further includes links to various other news stories which have covered developments on ESN.

   (b)   Motorola's promotion of ESN through advertisements of the EVOLVE LTE handheld device on Critical Communications Review.[9]

   (c)   Motorola's promotion of ESN through its numerous public briefings and leaflets, all aimed at the "*seamless transition*" to ESN.[10] In fact, as part of Motorola's 'Tomorrow's Technology Today' campaign, Motorola has sent various briefings to their UK public safety database that "*ESN is coming*"[11] and providing further information on ESN, thus highlighting the imminence of ESN transition.

   (d)   Motorola's promotion of ESN through its own social media platforms, including its LinkedIn page where Motorola has shared on multiple occasions that ESN is "*fast approaching*" and has provided further information on how to pair "*the MXP600 with your ESN devices and empower frontline staff with a rich and secure collaboration*".[12] Additionally, these promotions have been proactively shared by over fifteen Motorola employees.[13]

(7)   We trust that this submission has provided further clarification in relation to Motorola's role in the promotion of ESN. **There is no basis to consider that Motorola has demonstrated anything but complete support for the development of ESN.**

(8)   Motorola remains at the Panel Members' disposal should any questions arise in relation to any of the above.

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[8] Motorola Solutions Website, '*A New Emergency Services Network*', found at: https://www.motorolasolutions.com/en_xu/communications/esn.html

[9] Appendix, Critical Communications Review, *ESN Advertisement* at page 2.

[10] Motorola Solutions Website, '*Command Central Control Room Solution*', found at: https://www.motorolasolutions.com/en_xu/products/command-center-software/voice-and-computer-aided-dispatch/command-central-crs.html#tabproductinfo

[11] Appendix, Motorola Solutions leaflet extract entitled, '*Tomorrow's Technology Today, ESN is Coming*' at pages 3 – 4, and Motorola Solutions briefing extract entitled, '*MXP600 TETRA Radio*' at page 5.

[12] Appendix, Motorola Solutions social media posts regarding ESN and the imminent transition to ESN, at pages 6 – 7.

[13] Appendix, Motorola Solutions employees sharing Motorola Solutions LinkedIn post regarding ESN, at pages 8 – 17.