

6 January 2023



**MOTOROLA SOLUTIONS**

**Mobile Radio Network Services Market Investigation**

*Motorola's Comments on the Home Office's Additional Submission: Control Rooms*

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**Motorola’s Comments on the Home Office’s Additional Submission dated 14 December 2022: Control Rooms**

The below table corrects certain material inaccurate and/or misleading statements made by the Home Office in its Additional Submission: Control Rooms dated 14 December 2022. In the interests of transparency, Motorola trusts that this submission will be published alongside the Home Office’s submission on the CMA’s case page. Motorola welcomes all requests for further clarification or explanation.

Paragraph	Home Office Statement	Motorola’s Correction
2.3	Motorola’s Command Central Control Room Solutions (CCCRS) business currently has contracts for the provision of control rooms and associated ICCS services with five Police forces (two of which are live and three of which are being implemented) and six Fire and Rescue services (five of which are live and one that is being implemented). These services are provided under contracts with the user organisations.	This is incorrect. There are five Police forces, one of which is live, one of which is partially live, and three of which are being implemented. There are seven Fire and Rescue services, four of which are live and three of which are being implemented.
2.4	Before user organisations can transition to the ESN, it is necessary for each control room to be upgraded so that it can interface with (i.e. talk to) both the Airwave network and the ESN. If even one control room is not ESN compatible (by way of ICCS ESN upgrade), no Police organisation is able to transition onto ESN (not just the customers of the supplier of that control room) due to the National mutual aid requirements which require resources to be able to be deployed into UK forces at time of demand and criticality.	This is factually incorrect. The deployment of the previous interworking solution provided by Motorola ensured that ‘mutual aid’ capability would be maintained irrespective of the status of any customer’s control room solution (i.e. whether Motorola’s or otherwise) or the progression of transition from Airwave to ESN. It is our understanding that a new interworking solution will be deployed by the Home Office, a solution that they have indicated will be required to meet or exceed the satisfactory capability provided by the previous interworking solution. As such, and in particular because such solution will also include ‘mutual aid’, Motorola does not understand how a single control room has any bearing on the ability to commence full transition.
2.6	Motorola CCCRS refused to enter into any such agreement with the Home Office, [X].	This is a highly misleading characterisation and unfair to Motorola. In fact, Motorola did not believe it was appropriate for the taxpayer to in effect pay twice for the same upgrade arrangement. Motorola had, at this time, already made binding contractual commitments to its control room customers under which its CCCRS product would be developed for ESN. It was therefore

		<p>inappropriate for the Home Office to demand that Motorola enter into such a new contract.</p> <p>Motorola has entered into a Memorandum of Understanding (for which no payment will be received) with the Home Office to ensure that the Home Office is kept fully updated as to the progression of its control room development programme including driving development schedules in line with Motorola's existing contractual requirements whilst recognising the ESN programme's timelines, sharing technical specifications including features Motorola plans to implement, and inviting the Home Office to applicable work progress demonstrations with its customers. We are enclosing, for your record, a copy of a letter dated 24 March 2022 from [✂] at Motorola Solutions, which contains further details.</p>
2.8	<p>The Home Office's concern is, therefore, that, in the context of the new interface that will be required with the alternative MCPTT application (once procured), Motorola has the ability and incentive to delay the development of its ICCS solution, and both the absence of a contract between Motorola and the Home Office [✂].</p>	<p>Motorola's contracts with its current customers require Motorola to develop its CCCRS product to be fully compatible with ESN including any alternative MCPTT application. This will also apply to future control room procurements.</p>
2.10	<p>This delay may be exacerbated if Motorola CCCRS is to win more control rooms services contracts. Motorola has been increasingly winning Airwave network user organisations' business for the supply of control room services. It appears it has been doing so by offering its services at a lower price than its competitors, as well as offering to provide integration to the new DIMETRA Dispatch Communication Server (DCS) more quickly and</p>	<p>Motorola always strives to offer the best combination of price and quality for all of its customer requirements. The Home Office is however mistaken in its belief that Motorola's success is attributable solely to 'lower' prices. Since 2020, Motorola has successfully made six control room related bids. Of those six bids, Motorola was the cheapest in just one. Further details are available on request.</p>

	cheaply than other ICCS providers (which is required for the continued use of Airwave services).	Motorola cannot understand why the Home Office would object to Motorola being quicker than its competitors, assuming this were true. Motorola possesses no proprietary advantage relative to its competitors as all ICCS providers have had access to the relevant technical requirements for over four years. Again, further details are available upon request.
3.13	The Programme shared [REDACTED] <sup>12 13 14</sup>	Please see our comments on paragraph 2.6 above.
4.5	The Home Office does not have access to the prices at which Motorola has won its recent ICCS contracts with the emergency services; however, the Home Office is concerned that Motorola has been offering significantly lower prices than its competitors.	Again this is incorrect. Please see our comments on paragraph 2.10 above.
4.6	As Motorola sends its business relationship managers out to engage with forces on a monthly or three-monthly basis – to determine whether there are any other services that it can sell to those forces (e.g. PRONTO, a suite of applications that delivers mobile information services) – it is able to engage early with forces when their ICCS needs change.	Respectfully, this is an absurd comment. It seems to imply that Motorola should be holding back from engaging with its customers to supply better services.
4.8	Motorola was able to develop and test its interface to DCS and obtain Airwave Network Connection Certification in 2019, well before testing was available to other ICCS suppliers. The DCS interface specification was only published to the other suppliers in June 2020, and this was required to enable other suppliers to commence their development against DCS.	This is both incorrect and misleading. ICCS suppliers have been able to conduct testing for over four years, i.e. well before June 2020, so it is nonsensical to imply a competitive advantage accrues to Motorola given these open access arrangements. In fact, ICCS suppliers were notified on 10 April 2018 of the need to change to DCS and all ICCS suppliers (as members of the Motorola Applications Partner programme) have had access to the DCS API

<sup>12</sup> Email from [REDACTED] dated 10 February 2022 with subject line [REDACTED].

<sup>13</sup> For example, see email chain in February 2022 with subject line [REDACTED].

<sup>14</sup> Letter from [REDACTED] Motorola [REDACTED] dated 24 March 2022.

		<p>documentation and many suppliers operating in the international arena have had access prior to then.</p> <p>In 2018 Motorola provided free access to the Airwave reference system to encourage ICCS suppliers to take up the development of their products to DCS in time to ensure compatibility as soon as possible.</p>
4.9	<p>Motorola has therefore been able to demonstrate to users that it is able to upgrade them to the DCS [✂], giving it a commercial advantage when tendering for control room contracts.</p>	<p>This is incorrect. Please see our comments on paragraph 2.10 above.</p>
4.10	<p>In addition, the Motorola product can currently offer a new control room ICCS system to a customer more quickly and cheaply than other suppliers as Motorola has opted for a “hosted” offering, which means that user organisations do not have to pay for expensive and space-consuming server hardware at their own premises as the main server hardware and software has already been installed at Airwave’s host data centres.</p>	<p>Motorola has heavily invested in hosting infrastructure to enable it to provide state of the art services to its customers. The CCRS infrastructure is wholly separate from any Airwave infrastructure. Any other provider is able to make this investment decision, should they wish to do so.</p>
4.11	<p>For the reasons set out above, the Home Office suspects that Motorola will be able to leverage its market power, that it has obtained from its exclusive position in delivering the Airwave contract, to distort conditions of competition with ICCS providers in other downstream or related markets. That leveraging will give it an unfair advantage, making it more likely that it will win significant new ICCS contracts with Airwave user organisations over the next 12-24 months, gaining a much larger share of this market than it currently holds.</p>	<p>For the reasons previously explained, the Home Office’s assertions are wholly unfounded. Where Motorola has been successful, this is entirely attributable to its pro-competitive offering.</p>



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