

From: [Daniel Wilkes](#)
To: [Radio Spectrum](#)
Subject: Radio Spectrum Band III Consultation
Date: Friday, 27 May 2016 1:31:04 p.m.
Attachments: [image001.png](#)

To Radio Spectrum Management:

Waimakariri District Council has reviewed the Radio Spectrum Band III Consultation questions and wishes to comment on the following questions:

Q4. Should spectrum in Band III be allocated to LMR? If yes, how much spectrum would satisfy demand in this area?

Spectrum in Band III could be useful for land mobile but we believe a better use of the band would be wideband SCADA allocation for organisations involved in the provision of utility services. If spectrum is allocated for LMR use than this should also allow for the use of SCADA on those channels.

Q7. Is there a demand for exclusive spectrum in Band III, either now or in the future, for IoT technologies? If yes, which IoT technologies are demanding this spectrum?

Local body government and other public utility providers that operate SCADA systems are already significant users of radio spectrum across New Zealand. The demand for quality of data and throughput rates are increasing all the time and demand exists for higher bandwidth options for SCADA now that VHF/UHF channels have transitioned to 12.5 kHz. We would be like to see allocations for wideband (up to 50 kHz) channels to support the higher data rates required by modern systems. Demands are only likely to increase with time.

Spectrum in this frequency band for SCADA applications is also much more attractive than ~450 MHz UHF when considering terrain or other obstructions in the transmission path. We have one such application for which this would prove very useful.

Q8. If spectrum is allocated to IoT, how much spectrum would satisfy demand in this area?

We have reviewed the 4RF proposal for SCADA allocations in this band and believe their proposal would be suitable.

Q9. Which type of licensing framework is most appropriate for spectrum allocated to IoT?

We would like to see the same type of licencing that is currently employed for LMR channels in C and D band UHF.

Thank you for the opportunity to provide feedback on this matter.

Regards

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