



**NFCC**  
National Fire  
Chiefs Council

The professional voice of the  
UK Fire & Rescue Service

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**For the attention of:**

Stephanie Canet,  
Director, Markets  
Competition and Markets Authority  
The Cabot, 25 Cabot Square  
London  
E14 4QA

**By email**

02 September 2021

Dear Sir / Madam,

**Response to the Competition and Market Authority Consultation On the Supply of the Airwave Network in Great Britain**

The National Fire Chiefs Council (NFCC) is an overarching body that has a unique role in representing all fire and rescue services (FRS) in the UK on the national stage with one voice for maximum impact, harnessing the knowledge and expertise across the country and bringing it together for the benefit of all. The NFCC is a non-political organisation and is committed to supporting FRSs as they seek to improve service delivery at a local level. Safety is at the heart of what FRSs do; they provide a 24/7 insurance policy for communities and require excellence in systems that support this endeavour. The collaboration that the NFCC can encourage, negotiate and support with stakeholders from within the Fire and Rescue Service and beyond recognises that solutions and risk go beyond organisational boundaries, at a national or even international level.

The NFCC welcomes the opportunity to be invited to respond to the Competition and Markets Authority's (CMA) consultation on the Proposal to make a market investigation reference (MIR) the Mobile radio network for the emergency services. At this juncture, it is pertinent for the NFCC to highlight that for the main Firelink contract [the Airwave contract for the Fire and Rescue Service], the Home Office is the contract holder. Fire and Rescue Services (FRS) are users of the Airwave system and financially contribute to the overall cost paid for the Firelink contract and therefore have an interest in value for the public purse and local tax payers. There are instances whereby FRSs have procured some elements of an Airwave service or provision outside of the main contract and maybe classed as contract holders in this context, but, in terms of the Firelink contract, this represents a small proportion of the overall totality.

The information and analysis within the CMA's consultation documents details a comprehensive picture of a complex and long standing situation, and one where the NFCC recognises the accuracy and pertinence of many aspects. As set out in the documentation, the CMA makes a compelling case to undertake a market investigation reference (MIR) relating to the Airwave network.

Whilst the CMA consultation appears to quote 2019 as being the original end date for Airwave contracts, the NFCC believe that this should in fact read the end of 2016 for the end date of the (original) Firelink contract. The implication of this being that the Firelink contract and any advantage described by the CMA could potentially last for 10 years to the end of 2026, double the life of the original contract with consequential implications for FRS budgets and the public purse accordingly.

Specific examples and instances that the NFCC considers have relevance to any reference the CMA may undertake are to be found at appendix A, and the NFCC considers that these should not be for public disclosure. The Airwave Management Team at the Home Office, representing the Firelink contract holder, should be able to furnish much of the further detail and documentation relating to these.

The NFCC are open minded to any remedy that may emanate from a reference or that may be offered in lieu. Ultimately, the NFCC's priorities in this area revolve around the continuance of a mission critical, secure and resilient communications system to support the vital work that FRSs do allied to the cost of this to the public purse. The NFCC's view is that any reduction in cost, savings or other remedy must not be to the detriment of standards or quality of service of current or future essential communications systems.

Concerns have existed within FRSs for some time regarding Motorola's position in holding key contracts for both the current and future emergency services communications provision. This has inevitably incorporated perceptions of a perverse incentive in seeking to extend the elements that are more profitable and as such more costly to the public purse. Should the CMA undertake a MIR it will assist in clarifying this position and aid FRSs in delivering, and being assured about, value for the public purse.

Should you require further information or engagement with the NFCC or individual FRSs, please contact either Assistant Chief Officer Ben Norman, the Operational Communications Strategic Lead for the NFCC [bennorman@lancsfirerescue.org.uk], or Assistant Chief Fire Officer Ian Taylor, the NFCC's Deputy Lead for Operational Communications and Senior User for the Emergency Services Mobile Communications Programme [ian.taylor3@homeoffice.gov.uk].

Yours sincerely



Ben Norman

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Director of Strategy and Planning  
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