

Reference: 02272410

Information Requests
information.requests@ofcom.org.uk

29 September 2026

Freedom of Information request: Right to know request

Thank you for your request for information concerning aeronautical licensing.

We received this request on 21 August 2026. We sought clarification of your request on 3 September 2026 and you responded the same day. We have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

Your request & our response

Please I am requesting copies of Ofcom documentation, including internal policy, meeting minutes and correspondence with the Civil Aviation Authority (CAA) within the last 10 years on the subject of:

1. Aircraft Radio Licences, specifically:

a) the licensing of Air Traffic Control (ATC) Transponders

b) the requirement to hold a FRTOL to operate ATC transponders

c) the exclusion of low-power non-selectable ATC transponders (CAP 1391 Electronic Conspicuity Devices) from the requirement to hold a FRTOL

Clarified as:

I'm looking for documents meeting ANY of the criteria please.

What I am interested in with this request is to understand the inter-agency process behind making the change, in particular the extent to which the CAA had to consult and correspond with Ofcom before making the change. Hence my request for any correspondence, meeting minutes, etc between Ofcom and the CAA to understand how such changes have been handled on the Ofcom side in the past

2. Flight Radiotelephony Operator Licence (FRTOL), specifically:

a) any requirements required of the CAA by Ofcom as to the form and conduct of the FRTOL Practical Test, including permitting reasonable adjustments to the test under the Equality Act.

b) any discussions regarding distinguishing between FRTOL requirements for the operation of voice and non-voice based radio equipment.

3. The future of the ARL and FRTOL in light of the CAA's airspace modernisation strategy, proposed Electronic Conspicuity mandate and Unmanned Aircraft Systems Traffic Management (UTM).

4. Any Equality Impact Assessment or similar assessment of disability accessibility in respect of the above.

We are unable to provide this information as we consider that disclosure of this information is exempt under section 12 of the FOI Act. Section 12 of the FOI Act provides that we are not obliged to comply with a request for information if we estimate that the cost of complying with the request would exceed the “appropriate limit”. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (the “Regulations”), and is, for Ofcom, £450. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, locating, retrieving and extracting the information from any document containing it. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour, which equates to 18 hours of time.

We consider that your request is too broad. As your request currently stands, we estimate that it would take over 18 hours to locate, retrieve and extract the requested information due to the number of different email accounts and documents on our data management system we would have to search through.

For all questions, we would suggest narrowing your request to a period of 2 years.

In reference to questions 1 and 2, where you specify “including”, this means other types of documentation may also be captured. You may wish to consider submitting a narrower, more focused request, for example “correspondence with the CAA” and “policy decisions”.

In reference to question 4, “in respect of the above” could be narrowed by making it more specific – for example, you could say “in respect of the requirement for FRTOL”, or “in respect of FRTOL exemptions”.

With a narrower, more focused request, we would consider these under the FOI Act. However, should you decide to make a further request for information, please note the aforementioned appropriate limit and/or that other exemptions may apply.

In the cover email attached to this response we have also provided some advice as requested in correspondence.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner’s Office](#).