

Your response

Question	Your response
<p>Question 1: Do you agree with the proposal to license drone equipment rather than to licence exempt? If you disagree, please provide the evidence that would support any disagreement with the proposals.</p>	<p>Agree with the proposal</p>
<p>Question 2: Do you agree with the on the proposed authorisation approach for UAS? If you disagree, please provide the evidence that would support any disagreement with the proposals.</p>	<p>Agree with the proposal</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>Agree with the proposal</p>
<p>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</p>	<p>Y</p> <p>The lack of inclusion of “detect and avoid” equipment is a shortfall in this proposal. There are numerous off the shelf options now for active systems that work in RADAR frequencies (eg https://www.echodyne.com/defense/uav-radar/ and https://fortemtech.com/products/trueview-r30/) that we cannot conduct testing on without holding an innovation and trial license. This route is impracticable due to:</p> <ul style="list-style-type: none"> - Having to list all geographic sites. These change for demos/trials/collaboration on a regular basis. - Having to renew on an annual basis at risk. OFCOM docs say no guarantee of a renewal under this license type meaning expensive equipment, with long lead times, may become unusable in product development, so highly risky to invest in. How can we procure, integrate and conduct tests on

	<p>equipment to airworthiness standards (such as RTCA and ASTM), that we want release as part of our product when we may need to change to a different frequency each year. These changes would invalidate the extremely expensive lab and flight tests and jeopardise the ability for industry to get to market.</p> <p>It would be more supportive for OFCOM to agree a frequency band(s) under the operator license that can be used for detect and avoid at this stage rather than waiting for a future amendment.</p> <p>Detect and avoid is one of the major challenges to unlocking BVLOS capability for drones and the lack of a feasible (for product) licensing route is a hard blocker to progress. Not having a standard license route for this diminishes the value of the current scope of the operator license as operating BVLOS without Detect and Avoid capabilities is unsafe and can't be cleared without reliance on complex and location specific ground based systems,</p> <p>Off the shelf products already work in set frequency bands that could be assessed for technical feasibility under this consultation and included in the operator license to unblock this problem. The only other alternative is to develop these technologies overseas which goes against your references UK Govt Industrial Strategy.</p>
<p>Question 5: Do you agree with Ofcom's assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.</p>	<p>N</p>