

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>Confidential? – Y / N Yes but with the caveat that OFCOM needs to consult with UK MOD Defence Spectrum Policy. Its consultation so far is based mostly on the potential conflicts with areas of the spectrum that concern the CAA, including safety of aircraft, air traffic and aeronautical navigation systems. The consultation does not yet consider the implications to or from routine military training activity. We have identified some potential bands of conflict for routine use in training of several warship, airborne and land based military radars and the electronic attack (radar and comms jamming) provided during various training profiles. Radar or jamming propagation does not stop at geographic boundaries of training/danger areas and could cause interference to UAS operating in licensed bands outside the military danger areas. The military will not wish to reduce the quality of its training. Albeit that mitigations exist for delivery of training jamming effects and for cease jam actions via the UK MOD's Procedures for the Control of Non-Operational Jamming Policy (PCNOJ), there are potential implications to delivery of routine jamming effects for training of military operators and provision of trials support.</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>Confidential? – Y / N Yes but it does not account for a company employing a number of UAV operators across the same breadth of equipment and tasks. Individual licensing akin to pilot licenses is all very well, but type ratings and a company UAV operators' certificate could enhance the monitoring of the Regulatory environment between the CAA and OFCOM.</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>Confidential? – Y / N Good use of the previous licensing precedent for the proposed conditions. Access to airspace bordering military danger and training areas or transit through those areas when inactive will need careful consideration.</p>

Question 4: Do you have any comments on the proposed list of equipment and associated conditions?

Confidential? – ¥ / N

The proposed list of equipment and conditions gives suitable growth potential to expand the utility of and sophistication of UAS, through use of systems common to other manned aircraft. However, the bands considered do not factor the military use of the spectrum for training. In the E band, especially the 3.4 GHz sub-band, there are a number of warship radars, land based GBAD and airborne surveillance radars that could cause interference to UAS. Additionally, the delivery of military training activity through high quality threat replication profiles and authorised jamming effects mean that interference could be received outside military training areas down the east and south coast of the UK routinely and elsewhere during various exercises. There are other bands where interference from routine emissions or jamming for training purposes: the ASACS radars in D band and AI radars employed on all fighters, plus some naval fire control radars, in I band. Segregation of activity for safe operations may need additional considerations spectrally, geographically, temporally or through other procedures. The military will not want to reduce training value and as service providers of military training effects we wish to preserve that contractual revenue stream.

Question 5: Do you agree with Ofcom's assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.

Confidential? – ¥ / N

Agree