

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>Parrot Drones (Parrot) welcomes Ofcom’s efforts to address this issue. Nevertheless, Parrot does not consider that the proposed licensing framework is proportionate or necessary for the following reasons:</p> <ol style="list-style-type: none"> 1) Using LTE connectivity on drones/UAVs relies on LTE modules identical to laptops or any other IOT devices such as mobile phones. Parrot products do not use any specific part of the spectrum but use normal cellular connections (where legally permitted) with certified products (RED/CE...). Parrot products are using hardware already certified and complying with any licences/technical requirements in place via existing mobile network operators. In order to address potential interference risks, Parrot products may be tuned/restricted depending on each country local specification/requirement (e.g. disabling B7 2.6 GHz band in UK). Any limitations/restriction cannot be circumvented by end-user due to firmware protection. <p>As an acceptable alternative, introducing a licence exemption approach subject to meeting some technical requirements might be sufficient.</p> <ol style="list-style-type: none"> 2) Currently, mobile phone users pay monthly fees for their service to operators without licences paid to Ofcom by the end user or equipment manufacturer. There should be no difference for drone users while using the same technology compared to other IOT device uses. In addition, obtain a license for each end-user is very onerous. 3) There is no evidence that the use of micro-drones (below 2kg) would negatively impact the network. 4) Mobile network operators are already paying spectrum licences for spectrum usage that do not exclude drone usage. It could be considered that below 120m (low risk flight) the usage of 4G is like terrestrial use. 5) No other countries have introduced licences to end users or equipment manufacturers to Parrot’s knowledge. 6) 4G/LTE technology is seen as a technology facilitator for the development and acceleration of professional usage of UAVs. So far, the development of this specific area of the UAV business is in its infancy, Parrot deems that potential licencing at such an early stage could risk stifling innovation and create another barrier to entry in what is already a heavily regulated sector.

	<p>We note further support for facilitating drone operation using 4G/LT can be found in the recent publication by the UK DOT “Flightpath to the future”:</p> <p><i>“As part of the plan, the Government will set milestones and targets for achieving routine beyond visual line of sight drone operations and advanced air mobility trials.”</i></p> <p><i>“This will form part of a Government wide approach to delivering our vision for the UK to lead the way in the development and utilisation of aviation innovations.”</i></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>Based on Parrot’s answer in question 1, Parrot does not consider that the proposed licensing framework is proportionate or necessary.</p> <p>If the licence was to be implemented, Parrot considers it should be dealt with by the network operators as part of (inclusion) an airtime subscription and technical requirements or included in the drone operator licence managed by CAA.</p> <p>As mentioned in answer 1, if the proposed licence is implemented, Parrot would prefer a licence exemption under local requirements or light licensing regime.</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>As explained, Parrot disagrees with the drone equipment licence concept.</p> <p>If a licence is put in place, Parrot would want the system to be as simple as possible by a subscription with a network operator, or as part of the CAA Pfc0 licence fee.</p>
<p>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</p>	<p>The same rules and same uses (no differences) should apply to UAS or other devices either using managed network or direct radio.</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>To conclude, and according to Parrot’s previous answers, Parrot strongly disagrees with the introduction of a new (LTE) licence requirement or an additional Ofcom licence fee to be paid by UAS operator (separately).</p> <p>A general ban is not justified as long as manufacturers (including Parrot) can implement specific restriction(s) to avoid interference risks.</p>