

Your response

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Question 1: Do you think we should permit more commercial trial activity under the Demonstration and Trial licence (including with paying customers) and whether we should impose any limitations on this?	Yes. We support enabling larger, time-limited commercial trial activity under the Demonstration and Trial licence, provided it is made clear that such activity creates no expectation of long-term spectrum access or preferential terms for any subsequent authorisation. Any such extension should remain subject to appropriate safeguards for existing spectrum users. Confidential? – N
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	We agree that the transition from trialling to commercial deployment is the point at which the framework is under greatest strain. Predictability of timing is, in our experience, at least as valuable as speed. We would encourage Ofcom to continue publishing and reporting against its processing benchmarks, so that applicants can plan development and deployment around them with confidence. Confidential? – N
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	No comment at this stage. Confidential? – N
Question 4: Do you think it would be beneficial to enable faster processing of low power Innovation and Trial licence applications, based on lighter-touch assessment? Are there any particular frequency bands or locations Ofcom should look to prioritise?	Yes. We support a lighter-touch assessment route for applications where operating power is low or the location sufficiently remote that no material interference risk arises. Two features would determine whether such a route delivers its intended benefit. First, a published basis of qualification: the qualification criteria should be published, so that applicants can self-assess and design to those criteria from the outset. Second, proportionality by band and location: the extent of assessment should vary with the frequency band and site characteristics rather than apply uniformly, so that technical resource is concentrated where the interference risk lies. We do not propose particular bands or locations for prioritisation.

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Question 5: Do you have any other suggestions for improving Ofcom’s current approach to Innovation and Trial licensing?	Amazon Leo holds Innovation and Trial licences in the United Kingdom and has used them to support equipment testing and customer demonstrations. The features of most value to us have been the simplicity of the application process, the proportionate technical conditions, the modest licence fees, and the reliable processing timescales. We encountered no material difficulty and bring no complaint. Our principal suggestion is that Ofcom retain each of these features. Confidential? – N
Question 6: Are there new approaches to managing coexistence for bespoke spectrum licensing requests that we should implement to speed up the process?	No comment at this stage. Confidential? – N
Question 7: Do you think that there should be a greater expectation for applicants to provide the coexistence analysis to support their bespoke spectrum requests?	No comment at this stage. Confidential? – N
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	No comment at this stage. Confidential? – N
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	No comment at this stage. Confidential? – N
Question 10: What do you think should be Ofcom’s focus in updating how we licence spectrum to support wireless innovation? Do you have any	Amazon Leo’s overall encouragement is that Ofcom preserve the features of the Innovation and Trial regime that have worked well, while addressing the transition to

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other comments or views on the issues discussed?	commercial deployment. We look forward to the consultation on specific proposals in early 2027 and would welcome the opportunity to meet the Innovation Review Team to discuss our experience as a licensee and our perspective as a satellite operator investing in the United Kingdom. Confidential? – N
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	No comment at this stage. Confidential? – N