

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?	Confidential? – N Yes, with limits. Anduril Industries UK Ltd holds Demonstration and Trial (D&T) licences at its Llanbedr test site in North Wales (the ETTS range) to cover uncrewed aircraft command-and-control (C2) links, radar and transponder equipment. In our sector the step between trialing and deployment is usually an evaluation or demonstration which requires a quick turnaround to support sovereign development capability over other regions. The current 6 week timeline is challenging but acceptable in most cases however, if permitting an increase in commercial trial activity under the D&T licence were to impact this 6 week lead time further, this would be seen as a significant blocker rather than enabler. We support allowing time-limited commercial trials under D&T, including with paying customers, provided that: (a) the technical terms (frequencies, power, location, time period) stay exactly as coordinated, so interference risk does not change, (b) the non-interference, no-protection basis and Ofcom's ability to close the licence quickly stay in place, (c) a trial has a set maximum length (for example 12 to 24 months) and the licensee tells Ofcom that it is a commercial trial and (d) nobody expects the licence to lead automatically to a longer-term authorisation. The main change we are asking for is clarity:
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N Three suggestions. First, set out a clear route from a trial to a longer-term licence for the same equipment at the same site, so that coordination work already done under D&T can be reused rather than repeated from the start. Second, publish typical timescales and evidence requirements for bespoke and Science and Technology (Miscellaneous) licences so that programme and contract plans can allow for them. Third, align with other regulators. For uncrewed aircraft, the UK Civil Aviation Authority (CAA) requires evidence of valid spectrum authorisation for the C2 link and other radio equipment as part of a Specific Category Operational Authorisation (SORA, Operational Safety Objective 06). If the spectrum licence expires, lapses or changes during the transition to deployment, the aviation authorisation has to be updated at

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	the same time. Where spectrum is being used for safety-critical aviation C2, a coordinated Ofcom and CAA approach to licence terms and renewal would make the transition much easier.
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes. We run continuous test and evaluation from one fixed site, with the same set of frequencies and power levels re-coordinated each year. At present each licence has to be re-applied for every year. Each renewal also means updating the licence evidence held in our CAA operational authorisation files. We would welcome all three options: (1) site-based longer-term licences at established test sites and ranges, particularly those that sit inside Danger Areas or military ranges where airspace and activity are already controlled, (2) licences of 3 to 5 years or renewal without full re-coordination where nothing has changed, with licensees confirming annually that nothing has change (3) recognition of accredited or repeat test organisations. We would also welcome a simple variation process for adding a frequency or piece of equipment to an existing site licence (e.g. minimal relocation of transmitter coordinates within the same operating area).
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?	Confidential? – N Yes. We therefore see more benefit in a location-based light-touch route than a power-only threshold. We would ask Ofcom to prioritise: (a) remote coastal and range locations with existing airspace segregation (e.g. Llanbedr DA airfield or NDAC Wales test site, (b) bands commonly used for uncrewed aircraft C2, telemetry and payload data links (L-band, S-band and C-band, including the 5030 to 5091 MHz aeronautical C2 band) and for small radar systems, working with the MOD and CAA and (c) pre-agreed power limits per site agreed once with the incumbent spectrum managers, so that later applications within those limits need no third-party consultation.
Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – N Clearer and layered processing timelines for approval. For trial lengths which are minimal disruption (e.g. 1-2 days) or low power (as seen in response 4). Multi-site licences - allow one licence to cover several named test sites for the same equipment, rather than a separate licence for each site (even if this results in higher costs –

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	process and timing efficiencies is the core ask). (3) Visibility: provide an online application and status-tracking portal. Having a clear consultation process/step with an appropriate Spectrum Licencing SME where novel applications can be discussed prior to submission supporting program and development expectation.
Question 6: Are there new approaches to managing coexistence for bespoke spectrum licensing requests that we should implement to speed up the process?	Confidential? – N We support risk-based categories, 'low-risk trial zones' and a regulatory sandbox, especially at established test ranges where access to the airspace and the surrounding land is already controlled. A sandbox for uncrewed aircraft C2 and detection systems at such ranges would be useful. Coexistence risk could be managed through conditions set before operations start (for example power, time-of-day and geographic limits), monitoring by the licensee, a named 24-hour contact and a commitment to stop transmitting immediately if interference is reported, rather than through long up-front studies.
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?	Confidential? – N We are willing to provide more coexistence analysis, but two things currently get in the way. First, applicants have limited visibility of incumbent use, particularly government and defence assignments, so any analysis we produce is incomplete. Ofcom could publish or share under a non-disclosure agreement, the relevant incumbent data, propagation models and acceptance criteria. Ofcom should accept analysis supplied in confidence and allow a range of forms of evidence, including manufacturer test reports and field measurements. A published template setting out the minimum expected analysis would help applicants and reduce the back-and-forth.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N For spectrum supporting safety-critical aviation functions such as uncrewed aircraft C2, 3 to 5 years is a reasonable minimum, matching the typical length of a programme and its aviation authorisations. We suggest at least 12 months' notice for revocation for spectrum management reasons, with a shorter period only where there is a real interference problem that cannot be resolved another way.

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Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	Confidential? – N Possibly. Local Access licensing in mobile bands could support private LTE or 5G C2 and data links at test sites. We would welcome it being extended to other bands licensed on a geographic basis, provided that the incumbent has to justify any objection and that decisions are made within a set time.
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 other comments or views on the issues discussed?	Confidential? – N Ofcom's priorities should be: (1) predictable timescales and continuous authorisation for established test and evaluation sites (2) a clear route from trial to deployment for uncrewed aircraft and dual-use systems, joined up with the CAA and MOD and (3) proportionate, location-based risk management instead of fully coordinating every case. We would welcome a meeting with the review team to discuss uncrewed aircraft C2 and test-range use.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N Yes. (1) Rapid innovation where novel applications may take a longer time to implement however require clear expectations on what we can apply for – e.g. we currently have a potential government requirement for a demonstration where we must obtain a mobile licence for current 'fixed' technology (licences active). The ability to discuss and apply for a mobile or more complex D&T license is a significant priority and need to enable Sovereign UK organisations to meet UK government capability requirements.