

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. Apple supports allowing time-limited commercial activity, including trials involving paying customers, where this enables technologies and services to be evaluated under realistic operating conditions. Such authorisations should be proportionate to the interference risk and should not create an expectation of long-term spectrum access, preferential rights to spectrum, or prejudice subsequent national or international spectrum decisions. Appropriate safeguards should protect incumbent users and enable Ofcom to modify or terminate an authorisation where harmful interference occurs.
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N Apple encourages Ofcom to develop a clearer and more predictable pathway from trial to early commercial deployment, particularly where technologies are awaiting completion of international regulatory or standards processes. Where appropriate, Ofcom should consider transitional authorisations that permit limited commercial deployment for a defined period and under appropriate technical conditions. This could allow innovative services to reach the market earlier without prejudging longer-term spectrum policy or creating an expectation of permanent access. Greater transparency on the criteria, evidence requirements and indicative timelines for moving between trial, transitional, and long-term authorisations would also provide greater regulatory certainty for innovators.
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes. Apple supports longer-term and renewable Innovation and Trial licences where there is an ongoing research, development or testing requirement. Longer licence durations could reduce unnecessary administrative burdens and avoid gaps in authorisation.

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	Ofcom should consider streamlined renewals where the technical parameters, location, and interference environment remain materially unchanged. Longer-term innovation licences should nevertheless remain clearly distinct from permanent commercial spectrum rights.
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. Apple supports a risk-based, lighter-touch process for applications where the technical characteristics, power levels or geographic location demonstrate a low probability of harmful interference. Ofcom should consider establishing predefined technical thresholds and conditions under which applications can benefit from expedited approval, potentially supported by automated coordination tools. Rather than prioritising specific bands or technologies, Apple encourages Ofcom to apply this approach broadly wherever the interference environment permits. This would provide a technology-neutral framework capable of accommodating emerging use cases.
Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – N Apple encourages Ofcom to further digitise and automate the licensing process, including online applications, application tracking, and, where technically feasible, automated spectrum coordination. Ofcom could also consider establishing predefined regulatory "sandboxes" or innovation zones where a broader range of technologies can be tested under known technical conditions. Such frameworks could significantly reduce the time required to access spectrum while maintaining appropriate safeguards for incumbent users.
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 Yes. Apple supports greater use of risk-based, dynamic, and automated approaches to spectrum coexistence. Where appropriate, database-assisted coordination, geographic and temporal sharing, dynamic power limits and other automated coordination mechanisms can enable

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	more efficient spectrum access while ensuring appropriate protection of incumbent and prioritised users. Such approaches can provide scalable alternatives to case-by-case manual coordination, reduce administrative burdens, and enable more intensive use of spectrum. Apple encourages Ofcom to consider how these mechanisms could be incorporated into future authorisation frameworks, including in bands where multiple technologies may share spectrum under different access conditions.
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 Apple agrees that applicants should provide appropriate technical evidence to support bespoke spectrum requests, particularly where the proposed use may affect incumbent services, or have wider implications for spectrum use. Such evidence should be technically robust, transparent and based on appropriate methodologies, assumptions and protection criteria, with sufficient information provided to allow the analysis to be independently understood and scrutinised. At the same time, evidence requirements should remain proportionate to the scale, interference risk and maturity of the proposed deployment. Ofcom should provide clear guidance on methodologies, assumptions and protection criteria to promote consistency and avoid unnecessary duplicative analysis. Ofcom should retain responsibility for assessing the evidence, including the robustness of the underlying assumptions and methodology, and determining whether an authorisation appropriately protects existing spectrum users.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N There is unlikely to be a single minimum period appropriate for all innovative uses. The appropriate duration should reflect the level of investment, maturity of the technology, and nature of the proposed deployment. For early commercial or bespoke deployments requiring significant investment, a multi-year authorisation may be appropriate.

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	However, security of tenure should be balanced against the need to preserve flexibility for future spectrum policy decisions. Temporary or bespoke authorisations should not create de facto permanent spectrum rights or an expectation of renewal.
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	Confidential? – N Apple supports exploring opportunities to enable more efficient shared access to spectrum. However, the existing Local Access licensing model may not be the most appropriate or scalable mechanism for every frequency band or technology. The appropriate authorisation framework should reflect the technical characteristics of the band, the nature of incumbent use and the relevant sharing environment. Depending on the circumstances, automated or database-assisted coordination, dynamic spectrum access, general authorisation or licence exemption may provide more efficient and scalable solutions than individual Local Access licences. Apple therefore encourages Ofcom to consider a range of flexible sharing and authorisation mechanisms rather than applying a single licensing model across different bands and technologies. In particular, automated coordination mechanisms can enable additional spectrum access while protecting incumbent or prioritised users and should form part of Ofcom's consideration of future shared spectrum frameworks.
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 Apple encourages Ofcom to focus on creating an agile, proportionate and technology-neutral spectrum framework that enables innovative technologies to move more quickly from development and trial to deployment. Key priorities should include simplifying and accelerating access to spectrum, expanding risk-based authorisation approaches, enabling appropriate time-limited early commercial deployment, and making greater use of automated and dynamic spectrum coordination.

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	Apple particularly encourages Ofcom to continue exploring innovative spectrum-sharing frameworks that enable complementary technologies to access spectrum efficiently. The upper 6 GHz band provides an important opportunity to demonstrate how innovative sharing and automated coordination mechanisms can support complementary licensed and licence-exempt technologies, while ensuring appropriate protection of incumbent and prioritised users. Database-assisted approaches, including Automated Frequency Coordination (AFC), can provide a scalable mechanism for enabling additional spectrum access and more intensive and efficient use of spectrum. More broadly, Apple considers that Ofcom's framework should remain sufficiently flexible to accommodate different sharing and authorisation models, including individual licensing, general authorisation and licence exemption, according to the technical and regulatory circumstances of each band. At the same time, innovation and bespoke authorisations should complement, rather than circumvent, established spectrum policy processes. Temporary authorisations should not create preferential rights, establish a presumption of permanent access, or prejudice future national or internationally harmonised spectrum decisions.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N Apple recognises that delays in international harmonisation, equipment standardisation, and the development of appropriate regulatory frameworks can affect the timely introduction of innovative wireless technologies. The UK can play an important role in addressing these barriers through continued leadership and engagement in international and European regulatory and standards organisations. Apple encourages Ofcom to continue supporting globally harmonised spectrum and technical frameworks wherever possible, while using flexible national trial and innovation mechanisms to enable the UK to benefit from emerging technologies during the development of longer-term international frameworks.

