



# Strengthening the UK's radio spectrum regulatory framework for innovation

Fostering wireless innovation in the UK

**BT's response to Ofcom's call for inputs issued on 16 July 2026**

**Issue 1.0**

**30 September 2026**

# 1 Introduction

BT welcomes Ofcom's call for input<sup>1</sup> on strengthening the UK's radio spectrum regulatory framework for innovation.

Our responses to the consultation questions are provided in section 2 below.

## 2 Response to consultation questions

### Innovation and trial licensing

**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?**

We would give cautious support to this suggestion to permit more commercial trial activity.

Ofcom says the purpose of the test licences is to support innovation by facilitating the research, development and demonstration of technology. Provision of commercial services is not the purpose of these licences. We would expect Ofcom would need to consider matters such as competition aspects and appropriate pricing of spectrum to promote efficient and optimal use where commercial services are being offered and would issue specific licences for such use rather than allowing this under test licences.

Nevertheless, there may be instances where it is impractical to not charge for services that are being carried over the test licence spectrum. For example, where a new band is used with WiFi on a fixed line of an existing paying broadband customer, or a new band is trialled on a mobile network base station with existing mobile users that already pay for the service. In circumstances such as these examples, where the additional capability is not being specifically charged, for it would seem reasonable that Ofcom allows such incidental commercial use of the spectrum.

**Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?**

Ofcom could put strict time limits on any commercial use under test licences and be clear that any longer-term commercial use would require other licences that might be awarded competitively or be subject to other limitations and spectrum fees.

**Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?**

Yes, where testing is at a specific location it would seem sensible that innovation and research licences could be for an extended period or be extendable without starting a fresh application (subject always to the possibility of revocation if other authorised users of a band require to use it in that location).

---

<sup>1</sup> [Strengthening the UK's radio spectrum regulatory framework for innovation](#)

**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?**

We suggest Ofcom considers whether certain places could be pre-cleared for a range of frequency bands so that users would know an application would be successful without having to wait for a potentially lengthy frequency clearance process.

**Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?**

We have found the payments process/platform to be unreliable at times.

We also think that greater transparency or clarity around how fees are determined would be helpful, for example where multiple transmitters are involved the fees could depend on whether they are included in one or more application or how they are described.

The current application form is rather generic and it is not always obvious how best to provide the information for a given trial scenario. It might be worth looking at whether some more detailed templates for common application scenarios could be provided.

We would suggest that Ofcom considers a simplified process for a single transmitter with arbitrary multiple outdoor testing locations, within a wide campus area outside the 50m radius, without the need to have multiple licences.

## **Special requests and bespoke licensing**

**Question 6: Are there new approaches to managing coexistence for bespoke spectrum licensing requests that we should implement to speed up the process?**

No comments.

**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?**

Where coexistence analysis will speed up Ofcom's consideration of an application for a licence the prospective licensee could be invited to provide such information if it is able to do so.

**Question 8: What do you think is the minimum security of tenure needed to support innovative uses?**

Ofcom will need to find a balance between allowing enough time for innovative uses to become established commercially and not tying up spectrum that could be used for other purposes if the envisaged new commercial use does not succeed. A period of about 5 years may be appropriate, but the exact duration may depend on what application is being commercially offered.

**Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?**

Yes, potentially, if it is demonstrated that there is a requirement and it is practical to do so and does not unduly or unfairly affect the rights of existing spectrum licensees.

**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?**

We have no other comments.

**Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?**

No comments.