

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. Ofcom should permit genuinely time-limited commercial activity under Demonstration and Trial licences, including trials involving paying customers. A free technical demonstration cannot fully test whether a service works in the real world. Innovators need to test customer onboarding, billing, support, service quality, network loading, willingness to pay and operational processes. This is particularly important for small and community-built networks, which do not have the existing spectrum rights or resources available to established national operators. Payment should be allowed at a realistic trial price, not limited only to recovering direct costs. Otherwise, the trial cannot provide meaningful evidence about commercial viability or affordability. Commercial trials should have proportionate safeguards: • A defined purpose, geographic area, duration and technical scope. • Clear information for participants that the service is a temporary trial and may change or end. • No guarantee that spectrum or a permanent commercial authorisation will be available afterwards. • Transparent prices, cancellation arrangements and refunds for unused prepaid service if a trial ends early. • Compliance with consumer protection, data protection, equipment safety and complaints requirements. • Clear disclosure of coverage, reliability and emergency-calling limitations. • Continued non-interference and no-protection conditions, with Ofcom retaining the power to modify or stop transmissions.

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	• Customer, coverage or revenue limits only where justified by interference, competition or consumer risk, rather than a restrictive universal cap. The trial must not become an indefinite commercial service. However, it must be large and realistic enough to generate useful evidence. Ofcom should also provide a clear and timely route for successful trials to seek an appropriate operational licence.
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N Yes. Ofcom should create a clear and continuous route from trial to commercial deployment. A successful trial should not fall into a licensing gap while the operator starts an entirely new process. We suggest: • Allowing operational licence applications to begin before the trial ends. • Publishing clear eligibility criteria, evidence requirements and decision timescales. • Reusing technical studies, coordination results and measurements gathered during the trial instead of repeating completed work. • Providing a temporary bridging authorisation where an application was submitted in time and continued operation creates no additional interference risk. • Offering conditional commercial licences or a regulatory sandbox where no standard licence product exists yet. • Giving applicants an early indication of whether longer-term spectrum access is realistically available. • Charging proportionate fees and avoiding duplicated application and coordination charges. • Providing a named contact for complex transitions.

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Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes. Longer-term Innovation and Trial licensing options would be highly beneficial. Many trials require investment in equipment, installation, backhaul, software and customer support. A short licence may not provide enough time to test reliability, seasonal conditions, customer adoption or a realistic operating model. This is particularly relevant to outdoor, rural and community-network trials. Ofcom should offer renewable licences of three to five years for suitable low-risk trials, with: • Streamlined renewal where the location, equipment and technical parameters have not materially changed. • Eligibility based on technical risk and trial purpose, not limited to universities or established test houses. • Access for startups, small operators and community networks. • Annual confirmation that the trial remains active and compliant. • Proportionate reporting requirements. • Ofcom powers to vary or stop operation if harmful interference occurs. • Reasonable notice before withdrawal, except where urgent action is required. • Proportionate and predictable fees.
Question 4: Do you think it would be beneficial to enable faster processing of low power Innovation and Trial licence applications, based on lighter-	Confidential? – N Yes. Ofcom should introduce a faster, rules-based route for low-power Innovation and Trial applications that fall within published technical limits. Where the location,

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touch assessment? Are there any particular frequency bands or locations Ofcom should look to prioritise?	frequency, bandwidth, power, antenna height and emissions meet a pre-coordinated profile, the application should not require a new open-ended assessment every time. Only exceptions and marginal cases should proceed to full coordination. The highest priority should be the two Shared Access blocks within LTE Band 40: 2320–2340 MHz and 2390–2400 MHz. This does not mean blanket access to the entire 2300–2400 MHz band. Ofcom should begin with 2320–2340 MHz. Its short-notice licence already demonstrates that indoor and outdoor use can be processed quickly through protection zones, fixed separation distances, power and antenna-height limits, and non-interference, non-protection conditions. This framework should be adapted into a faster route for longer low-power trials, supported by an indicative availability checker and a standard equipment declaration. Ofcom should then establish a controlled outdoor trial programme for 2390–2400 MHz. This block has a more complex coexistence environment, including the adjacent national mobile assignment and services above 2400 MHz, so it should have its own technical profile covering synchronisation, filtering and out-of-band emissions. Carefully managed trials would generate the evidence Ofcom says it needs, instead of leaving outdoor access unresolved indefinitely. Geographically, Ofcom should prioritise technically suitable rural and poorly served communities outside relevant protection zones. Community-scale Band 40 deployments could improve local coverage and capacity while supporting lower-cost services. Remote sites should not automatically be treated as low risk because clear rural propagation can increase interference range. Decisions should be based on modelling or measurements, with public benefit used to prioritise technically eligible sites. Faster processing must not mean weaker protection. Licences should retain location and equipment controls,

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	record keeping, a named interference contact, and requirements to reduce power, retune or cease transmission if harmful interference occurs.
Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – N Ofcom should redesign Innovation and Trial licensing around complete projects and networks rather than repeated emailed forms for individual locations. The current Demonstration and Trial fee is £50 per location per month. A ten-site community mobile trial lasting twelve months would therefore incur £6,000 in spectrum fees before any equipment, installation, backhaul or operational costs. This is disproportionate where the sites use the same equipment, technical profile and network core. Ofcom should introduce a portfolio fee for multi-site trials. There should be one charge for assessing the common project, a small marginal charge for each additional standard site, and a reasonable overall cap for qualifying community and public-interest trials. An unchanged extension or additional site should not attract the cost of repeating work Ofcom has already completed. Applications should be managed through an online portal that supports payment, amendments, renewals, status tracking and structured batch uploads of site information. For Band 40, Ofcom should also provide an indicative availability checker showing whether a proposed location is likely to be available, unavailable or require further assessment, without revealing sensitive incumbent information. Ofcom should publish service standards for validation, coordination and decisions. Applicants should be told which stage each site has reached and receive a clear technical reason when it is referred or rejected. Previous coexistence work should be reusable. Once Ofcom has accepted a particular radio profile, antenna pattern or coexistence study, an applicant should only need to identify material changes. Technical evidence

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	and compliance history should also carry forward when a successful trial moves towards commercial authorisation. The simplified 2320–2340 MHz short-notice framework should provide the starting point for longer and multi-site Band 40 trials. The more complex 2390–2400 MHz block may require different limits and manual referral in some cases, but it should still be included in Ofcom’s mapping, portal and trial programme.
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. Ofcom should move from repeated, open-ended coexistence studies to a tiered, rules-based system, beginning with 2320–2340 MHz and 2390–2400 MHz. Applications falling entirely within a published low-risk technical envelope should receive automatic or near-automatic approval. Applications that narrowly exceed the envelope should receive expedited engineering assessment. Full bespoke analysis should be reserved for genuinely complex or higher-risk cases. For 2320–2340 MHz, Ofcom should build on its existing pre-coordination model of protection zones, fixed separation distances, power limits, antenna-height limits and non-interference, non-protection conditions. That model already shows that incumbent protection does not require every application to begin from first principles. Ofcom should develop a location-aware coordination system that accepts the proposed coordinates, antenna details, frequency, bandwidth and power, then returns an available channel, maximum permitted power and any necessary conditions. Ofcom’s Automated Frequency Coordination system for 6 GHz demonstrates the regulatory principle, although the technical criteria would need to be developed specifically for 2.3 GHz rather than copied directly. For outdoor use of 2390–2400 MHz, Ofcom should publish a separate coexistence profile. Its current guidance already identifies UTC-aligned TDD synchronisation and a

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	compatible 3:1 frame structure for any future permitted outdoor deployment. The assessment should also account for out-of-band emissions, the adjacent national mobile assignment, other Shared Access users and sensitive services above 2400 MHz, including assistive listening equipment. Faster authorisation could be conditional on accurate deployment records, a named interference contact, operational monitoring and the ability to reduce power, re-tune or shut down promptly. Incumbents should be able to update protected locations, while applicants should receive a clear outcome without sensitive operational information being disclosed. Ofcom should test this through an outdoor Band 40 pilot in rural and poorly served communities. Successful configurations should become standard authorisation profiles so that later applicants do not have to fund and repeat the same coexistence work. This would protect existing users while giving community-built networks a predictable and affordable route to deployment.
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 Yes, but only on a proportionate basis. An applicant seeking genuinely bespoke commercial spectrum rights should be expected to provide accurate technical information and a reproducible first-stage coexistence analysis. The applicant is best placed to describe its equipment and proposed network. This must not become a blanket requirement for every applicant to commission an expensive consultancy study. That would favour national operators and large vendors over small businesses and community networks without necessarily improving spectrum management. Ofcom should establish three levels of evidence. A standard or demonstrably low-risk deployment should require only a declaration against published technical conditions. A request that departs from those conditions should require applicant-led modelling. A comprehensive coexistence study, potentially subject to independent review,

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	should be required only for genuinely novel or higher-risk requests. Applicants should provide coordinates, frequency, bandwidth, EIRP, antenna height and pattern, emissions performance, operating schedule, TDD configuration, synchronisation, deployment density and proposed mitigations. Any modelling should identify the propagation model, assumptions, data sources and uncertainty so that Ofcom can reproduce it. In return, Ofcom must publish the relevant protection thresholds, accepted propagation models, default assumptions, aggregation methods, study boundaries and submission templates. Where incumbent information cannot be disclosed for security or confidentiality reasons, Ofcom or a trusted coordination system should perform that part of the assessment. Ofcom should retain responsibility for verification and the final licensing decision. Any incumbent objection should be supported by relevant technical evidence. Band 40 provides a practical starting point. Ofcom already requires licensee-led calculations under its 2350–2390 MHz MOD coordination procedure, using published thresholds and a specified propagation method. Its short-duration 2320–2340 MHz product separately demonstrates that pre-coordinated rules can remove the need for individual studies in lower-risk cases. Ofcom should publish standard outdoor coexistence profiles for 2320–2340 MHz and 2390–2400 MHz. Additional applicant analysis should only be required when a proposed deployment falls outside those profiles. Generic analysis accepted for one equipment profile should also be reusable for materially identical later sites.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N Five years of assured access should be the absolute minimum for any use requiring fixed infrastructure, external investment or paying customers. For an operational community network, a ten-year term or a rolling licence with at least five years' notice for spectrum-management revocation would be more appropriate.

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	The present Local Access regime does not provide sufficient certainty for this type of investment. The default term is three years. A longer term requires the incumbent licensee's support, and the licence cannot be renewed. Continued access requires a completely new application with no guarantee of success. The problem is therefore uncertainty at expiry, not an ability for an MNO to cancel a compliant licence whenever it chooses. Nevertheless, an operator could invest in radios, installation, backhaul, its core network and customer acquisition, only to lose the ability to continue serving the community after three years. That is not a sufficient basis for sustainable local infrastructure. Ofcom should provide a firm minimum term of five years, with ten years available for operational networks without requiring a separate commercial agreement with the incumbent. There should be a presumption of continued access where the spectrum is being used efficiently and the licensee is complying with its conditions. Ofcom should decide whether access will continue at least two years before the existing term expires. An objection to continued access should demonstrate an actual or firmly committed incompatible deployment. A general possibility that the incumbent might use the spectrum at some point should not be sufficient. Where access must end, Ofcom should provide a reasonable migration period and, where technically possible, an alternative frequency. Immediate action must remain possible for a licence breach, actual harmful interference or an emergency. Those safeguards should be kept separate from normal spectrum-management decisions.
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	Confidential? – N Yes, but Ofcom should first improve the existing regime and preserve its current technology-neutral principle. Local Access already covers 2350–2390 MHz and already permits technology different from that used by the incumbent. The adjacent 2320–2340 MHz and 2390–2400 MHz blocks are Shared Access spectrum, so they should

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	not be treated as though they require permission from a national licensee. Band 40 should be the first priority across both regimes. Ofcom should create a unified availability and application service covering Local Access in unused nationally licensed 2350–2390 MHz spectrum and Shared Access in 2320–2340 MHz and 2390–2400 MHz. The present short-notice licence demonstrates that outdoor operation can be coordinated in 2320–2340 MHz using protection zones, separation distances, power limits and non-interference, non-protection conditions. However, its maximum duration of 14 days makes it unsuitable for community infrastructure. The experience from that product should now be used to establish a durable outdoor Shared Access route. Ofcom should also commence controlled outdoor trials in 2390–2400 MHz, with appropriate TDD synchronisation, filtering, out-of-band emission limits and protection for sensitive services above 2400 MHz. Beyond Band 40, the Local Access principle should be extended to other nationally or geographically licensed bands where local reuse can be objectively coordinated. Ofcom should use a technology-neutral eligibility test based on whether the incumbent can be identified, unused areas can be established, coexistence can be modelled and suitable equipment is available. Ofcom should also update its published Local Access guidance to identify every band now covered by the current Mobile Trading Regulations and explain whether applications are practically available in each one. Merely adding bands on paper will achieve little if applicants still face an uncertain process, a £950 charge and insufficient tenure.
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 main priority should be creating a genuine route from experimentation to durable and affordable commercial service. An innovation licence has limited value if an operator proves that its technology works but must

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	then stop because no viable ongoing authorisation exists. The clearest immediate opportunity is outdoor local use of the Shared Access portions of the LTE Band 40 ecosystem, specifically 2320–2340 MHz and 2390–2400 MHz. This is not a request for general access to the entire 2300–2400 MHz band. Ofcom should establish a long-term outdoor Shared Access product for 2320–2340 MHz as a priority. This should be followed by a controlled pathway for 2390–2400 MHz once the necessary adjacent-band safeguards have been validated. The products should support community-built public mobile services as well as private networks and temporary events. Licensing must be affordable and capable of scaling across many small cells. Ofcom currently charges £160 annually for a separate 20 MHz low-power licence area in 2.3 GHz. One hundred separate licence areas would therefore cost £16,000 every year before equipment, installation, backhaul or network operation. A fee designed for an isolated private site becomes a serious barrier to a distributed community network. Ofcom should introduce portfolio licensing, with one assessment of the common network design, a low marginal charge for each additional standard location and an overall fee cap for qualifying community or public-benefit deployments. The £950 Local Access fee should also be reduced for applications that fall within standard, pre-assessed technical conditions. Applicants should receive an indicative Band 40 availability map, machine-readable technical requirements, predictable decision times and specific reasons for any refusal. Successful trials should be able to transition into commercial authorisation without repeating the entire technical assessment. Meaningful tenure and predictable continuation are equally important. Established national operators can plan around long-term spectrum portfolios. A commu-

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	nity operator should not have to build public infrastructure around repeated short-term, site-by-site uncertainty. Ofcom should measure success by whether trials progress into safe and sustainable services, how quickly unused spectrum is brought into productive use, and whether local licensing produces greater competition and tangible benefits for communities. The objective should not simply be issuing more trial licences. It should be enabling more people to benefit from the resulting networks.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N Yes. We encounter several connected non-spectrum barriers. None justifies weakening safety, security or consumer protection, but their combined complexity and fixed costs can make entry disproportionately difficult for a small community network. The first is handset and IMS interoperability. Supporting an LTE frequency band at radio level does not guarantee that VoLTE, SMS, eSIM and other carrier-dependent functions will operate on a smaller network. Our testing has found significant differences between handset models and software versions. Ofcom has also acknowledged that some devices require settings or software updates and that less common handset models can have incompatible VoLTE implementations. Ofcom and DSIT should bring smaller public networks, device manufacturers and standards bodies together to establish an accessible process for carrier configuration, IMS interoperability testing, eSIM support and emergency functionality. Manufacturers should retain appropriate technical testing, but access to the process should not depend primarily on an operator's subscriber scale. A second barrier is demonstrating compliance with emergency-call requirements. Small public mobile networks need a clear assurance and testing route covering 999 and 112 access, Limited Service State, caller-location information, network identification, call-back limitations and consumer information. Safety-critical functionality

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	should be formally tested rather than left to assumptions about handset behaviour. Interconnection and ordinary roaming also involve substantial fixed technical, legal and commercial costs. General Condition A1 requires public network providers to negotiate interconnection on request, but there is no simple low-volume onboarding route for a new community operator. Emergency network selection is not a substitute for an ordinary roaming agreement. Ofcom should investigate whether interconnection and roaming negotiations are genuinely accessible to small local operators and provide standard technical processes and effective escalation where negotiations fail. Physical deployment creates further barriers. Community cells require willing hosts, suitable mounting, safe electrical installation, backhaul, insurance and the correct planning or permitted-development route. Electronic Communications Code rights can simplify deployment, but they apply only after Ofcom has granted Code powers. The Code-powers process and charges should be proportionate for legitimate small operators, while government and local authorities should provide standard agreements and clear guidance for low-impact community installations. Radio-equipment conformity and supply create additional fixed costs, particularly where specialised equipment is imported in small quantities. Ofcom, DSIT and the Department for Business and Trade should publish a practical Band 40 conformity checklist and improve access to suitable testing facilities. Finally, the pathway is fragmented across spectrum licensing, Mobile Network Codes, numbering, interconnection, emergency services, number portability, consumer protection, security, planning and equipment conformity. Ofcom should provide one guide for small public mobile networks and a named new-entrant contact. Smaller providers still have security obligations, but the detailed 2026 Telecommunications Security Code is principally directed at large and medium-sized providers. Equivalent proportionate guidance for small providers

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	would improve certainty without lowering security standards.