

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, but with a contact/contact details to enable rapid cessation of transmission. The aim would be increasing flexibility when conducting interference assessments.
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N Renewing previously granted licences could be streamlined. Trials assets are often tested in the factory and may then be used across multiple sites, each needing new licences. Distinction between full power/field testing and low power indoor use would help provide clarity when a T&I licence is needed vs “normal” on-site testing.
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes. See above and Q8
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 Reducing the turnaround time for “low power” licences would be highly helpful for smaller or short timescale projects, however there is very little guidance as to what defines “low power”. Many other licences have documentation on recommended maximum transmission power etc. Whilst it is understandable that the nature of Trials and Innovation activities means that there is no “one size fits all” approach, if some recommendations were available for certain use cases (e.g. broadband pulsed transmission) it would help to submit a licence within bounds of reason, or at least one which would not be rejected outright. Frequencies highlighted are ~425 MHz, S- and C-band and transponder tracks (5400-5900 MHz).

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Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – N YES. An Ofcom desk officer has previously conceded that the I&T licencing process was challenging; especially if an existing spectrum user 'has concerns' about an application, the application will be refused by Ofcom with very limited feedback and no right of appeal/discussion with the relevant stakeholders. The applicant then has to try again with different station parameters or location until they get lucky. This situation can be improved by allow applicants to discuss any concerns about proposed transmissions with existing spectrum users directly and in good faith, with Ofcom acting as a technical facilitator between the parties with the goal of achieving a mutually satisfactory outcome. It is also reasonable for Ofcom to ask existing spectrum users to supply evidence that the proposed transmissions will adversely affect their activities. Equipment is often to be used across multiple sites (either due to customer availability or development collaboration) and refusal or delay of licences that are identical creates issues. Multi-site applications would be useful to combat this.
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 Information about the electronic environment in the area where the proposed station is to be located would be useful in terms of both planning a trial/experiment as well as also tailoring the application to support coexistence with other spectrum users. Clear information should also be provided on the application form in order for the applicant to calculate signal transmission strength, central frequency, bandwidth and acceptable spurious emission levels. Otherwise the applicant has to decide which ITU recommendations are most likely to apply (a non-trivial task for exotic transmitters) and self-police their application.
Question 7: Do you think that there should be a greater expectation for applicants to provide the coexistence	Confidential? – N This is not an unreasonable expectation but it must work both ways. The applicant is highly unlikely to be in a

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analysis to support their bespoke spectrum requests?	good position to understand the likely impact of their transmissions on existing spectrum users' equipment and cannot therefore refute any concerns which may arise from an application. Thus a collaborative approach from all interested parties is essential.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N One year seems adequate for research applications, but it should be possible to extend an existing I&T licence if needed, particularly if transmissions are sporadic and infrequent within the licence period.
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	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 other comments or views on the issues discussed?	Confidential? – N Give greater consideration to broad-band / short pulse transmissions. The current application form is structured such that there is a tacit assumption that the peak power in a pulsed transmission is effectively continuous and is applied uniformly across the entire pulse bandwidth. Technically correct responses are therefore likely to cause alarm to existing spectrum users and prompt immediate objections.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N