

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?	No comment
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	No comment
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – No Yes, it would be beneficial if licences can be granted which last for more than one year. For example, five years. Many of our products take years to develop, and we then spend years supporting them. Throughout this period we have to retain a development licence. It would greatly cut down on administrative burden and business uncertainty if these development style licences could be issued to last longer than the current maximum of 1 year, e.g. 5 years.
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? – No Yes, it would be beneficial if a lighter touch assessment was available for specific (e.g. low power or remote) applications. As an example, in certain circumstances we would like to suggest a similar approach could be taken as applied under the 'Testing and Development under suppressed radiation conditions' framework. For example - if a transmission is sufficiently low power, such that resulting field strength can be shown to fall below a certain threshold X metres away (or at the permitter of the operator's premises), then a light touch assessment could be applied.

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Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – No Yes, we would like to propose a few other improvements. Suggestion 1. We would like to propose that the process of stakeholder feedback regarding licence applications is made more transparent. Even if specific organisations can't be named, it would be useful if we could be told where objections came from (e.g. by industry or geographic location). This would make it easier to propose and agree compromises or mitigations. Suggestion 2 – we would like to propose that Ofcom look at developing a training offering for applicants/users/stakeholders for these types of licences. This would help to ensure that there is a common understanding and approach across industry. Suggestion 3 –Where stakeholders object to a licence application, it would be helpful if they could be asked to provide their rationale. For example, in some instances we received objections to our applications even though there was no apparent technical justification for the objection (i.e. due to the trivial transmit power involved). Suggestion 4 - Where there are complex applications, Ofcom sometimes suggest to attach a spreadsheet with the details. We would like to suggest that it may be easier for Ofcom to process the applications if they provided a template in their desired format which applicants could fill in.
Question 6: Are there new approaches to managing coexistence for bespoke spectrum licensing requests that we should implement to speed up the process?	No comment

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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? – No Yes, where detailed technical analysis is required to support an application it makes sense for the applicant to perform that analysis when equipped to do so. It would be helpful if Ofcom could provide guidance around the format and content of suitable coexistence analysis. Presumably this would also make it easier for Ofcom to review.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	No comment
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	No comment
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?	Yes, we have a view. Confidential? – Partially (Suggestion 1 confidential only) Suggestion 1 [CONFIDENTIAL ✂] Suggestion 2 (not confidential). Each time an application for an innovation and trial licence is needed for longer than the existing licence allows (which in our case could be multiple times over a project lifecycle, i.e. over a decade), we understand it is treated like a brand-new application and is subject to the same rigour. We would like to suggest that repeat applications (i.e. for exactly the same equipment/location/technical parameters) as an existing licence should be treated differently to brand new applications. For example, there could be recognition that there have been no reported interference issues in during the previous licence period, and a light touch assessment applied. Suggestion 3 (not confidential). The output of the previous consultation regarding ‘Updating Wireless telegraphy Exemptions’ (Statement: Updating wireless telegraphy exemptions) was published in October 2025, but as yet the proposed changes to the ‘Wireless Telegraphy (Testing and Development Under Suppressed Radiation

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	Conditions) (Exemption) Regulations 1989' have not been implemented. It would be good to know how that is progressing, given it would also help to reduce the number of required innovation licences.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	No comment