

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 No response. This is not applicable to Vertical's use case of demonstration and trial licences.
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N No response. This is not applicable to Vertical's use case of demonstration and trial licences.
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes, this would be highly beneficial. Vertical uses a demonstration and trial licence predominantly for flight testing around a fixed location. Flight testing is a multi-year activity, and we current submit a substantially similar D&T application annually. A licence type that permitted indefinite use so long as the applicant operated within certain limits, paid the fee and was actively using the spectrum allocated to them would reduce the administration burden for applicants and OFCOM. This licence could be terminated or amended with reasonable notice if required by OFCOM in consultation with the applicant.
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. Vertical occasionally needs to conduct flight tests or demonstrations at different locations across the UK. Under the current process, this requires extensive prior liaison with OFCOM and D&T licence applications covering all plausible routes, for example routes involving multiple recharging stops between Cotswold and Farnborough airports. The fixed 30-day consultation period prevents short-notice route changes, resulting in applications covering much larger areas than are ultimately required and increasing the administrative burden for both Vertical and OFCOM.

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	A lighter-touch process for short-duration, relatively low-power transmissions on unconflicted frequencies would significantly reduce this burden, particularly for use cases that are similar to aircraft in transit or operating from a temporary location for only a few hours. Publishing suitable power levels, geographic locations and frequencies in advance would also help applicants submit requests with a greater likelihood of approval. Vertical uses S-band frequencies in the 2300–2400 MHz range.
Question 5: Do you have any other suggestions for improving Ofcom’s current approach to Innovation and Trial licensing?	Confidential? – N The current D&T licence application process could be aided by having access to an interactive map of where operation at given power levels and frequencies would conflict with other licenced spectrum users. This could help applicants plan their application to minimise the risk of a conflict. To get feedback on the progress of a D&T licence application, the applicant must contact OFCOM. This is a burden for the OFCOM staff that could be reduced by implementing a self-service portal where applicants could check the status of their application and opt in to getting automated updates whenever their application status was updated.
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 No response.
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 No response.

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Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N No response.
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	Confidential? – N No response.
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 No response.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N No response.