

Your response

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Question 1: Do you have any comments on our decision to update the equipment list and terms and conditions for all Ship Radio and Ship Portable licences?	Confidential? – N The GLA support the proposed changes relating to specifying if a piece of radio equipment falls into AMRD Group A or Group B.
Question 2: Do you agree with our proposed approach to phasing out Ship Radio licence and Ship Portable Radio licence authorisations for use of legacy MOB AIS and other AMRD Group B defined devices? If not, please state your reasoning.	Confidential? – N The GLA support the phasing out of licence authorisations for AMRD Group B. Removing AMRD Group B (devices not related to the safety of navigation) from channels AIS1 and AIS2 will help keep these channels free for navigational safety purposes. The GLA also support the proposal to make AMRD Group B entirely licence free. This would encourage the proliferation and use of these devices, thus further helping remove 'non-safety' traffic from AIS1 and AIS2. The GLA note that as Group B devices serve no safety purpose, they will have no need for users to qualify in their correct use. Furthermore it is acknowledged that antenna restrictions and a low 100 mW RF output suggest AMRD Group B are highly unlikely to cause harmful interference to other VHF users. The GLA have no comments on the proposals to phase out legacy MOB AIS devices.
Question 2(a): Do you have any comments on the proposed notice periods?	Confidential? – N The GLA have no comments on the proposed notice periods.
Question 3: Do you agree with our proposal to enable the deployment of Mobile Aids to Navigation under the AIS licence?	Confidential? – N The GLA support the proposal to enable the deployment of Mobile Aids to Navigation under the AIS licence. However, the GLA wish to recommend that

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	i) Deployment of Mobile AtoN is restricted only to organisations that have a recognised need to deploy them. ii) Licencing is suitably flexible to allow rapid deployment of Mobile AtoN if this is required (for example, to mark a new wreck or floating debris). To facilitate this, the GLA suggest a licencing regime similar to that which supports the rapid deployment of emergency AIS wreck marks; issuing competent authorities a group of MMSI numbers to use for this purpose.
Question 4: Do you agree with our proposal to update the AIS licence to include two ASM channels? If not, please set out your reasoning.	Confidential? – N The GLA support the proposal to add ASM to the AIS licence. Doing so will allow authorities, such as the GLA, to begin phasing in use of the two ASM channels. This will eventually help take traffic away from AIS1 and AIS2 thereby keeping those AIS channels free for navigational safety use.
Question 5: Do you agree with our proposals to clarify the AIS licence terms and conditions? If not, please set out your reasoning.	Confidential? – N On the understanding that <i>“these are editorial changes and have no impact on [AIS or VDES] use under the licence”</i>, the GLA have no comments on the proposals to clarify AIS licence terms and conditions.
Question 6: Do you agree with our proposal to authorise VDES channels (VDE-TER and VDE-SAT) for operation on vessels under the Ship Radio licence?	Confidential? – N The GLA support proposals to authorise VDE-TER and VDE-SAT for operation on vessels. Allowing use of these channels by ships will assist the phase-in of VDES, both in the UK and internationally.
Question 7: Do you consider there to be a near-term demand for VDES use by UK coastal stations? If so, please set out your reasoning.	Confidential? – N SOLAS Chapter 5 amendments are expected to be adopted such that VDES equipment may be installed aboard ships as an alternative to AIS equipment from January 2028. It is from this date that services may begin to be provided via VDES. Given the increasing need to secure data related to navigational safety, the GLA acknowledge a key use of VDES will be to authenticate AIS messages; this being achieved

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	by carrying cryptographic ‘digital signatures’ within VDE-TER channels. Here it is noted that: ○ The International Maritime Organisation (IMO) draft Maritime Safety Committee (MSC) ‘<i>Circular on Guidelines for the Operational Use of Ship-borne VDES</i>’ states “A core capability of VDES is to provide secure AIS functionality by ensuring the integrity and authenticity of transmitted AIS messages”¹. ○ The International Organisation for Marine Aids to Navigation (IALA) Recommendation R1024 calls for all data within the IALA domain (including AIS AtoN) to be provided with a means of authentication. ○ The draft IEC 63514 standard (expected 2026/27) includes requirements for the authentication of AIS messages; this is derived from IALA guideline G1192 on VDES authentication. These IEC and IALA documents describe the process of AIS authentication using digital signatures carried in VDE-TER channels. Consequently given the need to secure data related to navigational safety the use of VDE-TER for AIS authentication could see relatively rapid adoption in coming years. It is suggested such adoption may begin at key ports/harbours and over key navigational routes. We further note that the authentication of GLA AIS Aids to Navigation using VDE-TER is being addressed by a GLA work plan.
Question 8: If Ofcom were to enable VDES use on coastal station, do you have views on whether Ofcom should individually assign and coordinate VDES frequencies, or whether users should share VDES channels on a self-	Confidential? – N This matter is currently under consideration by VDES research groups. It is an area of active discussion at IALA and the IALA Digital Technologies Committee Working Group 3 (DTEC WG3) will have an intersessional meeting in China in the summer focused solely on this topic. It is suggested

¹ International Maritime Organization, ‘Report of the Maritime Safety Committee on its 110th Session’, Report MSC 110/21/Add.3 (Draft MSC Circular on Guidelines for the Operational Use of Ship-borne VDES), Sep. 2025

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coordinated basis? Please set out your reasoning.	a clearer picture will emerge of the best approach to use once these technical discussions are completed. Nonetheless, it is suggested by the GLA that some form of self-coordination (perhaps in a similar manner to AIS self-coordination) will be essential to allow broadcast of VDE-TER messages suited to carrying the digital signatures needed to secure AIS messages; further noting that self-coordination is likely to offer most efficient use of spectrum. Despite this requirement, it is acknowledged that, particularly in the case of “large” messages with the potential to dominate spectrum use, some organisations may prefer some form of time/channel allocation to help ensure fair use of spectrum, particularly across borders. Currently, the GLA’s position is to remain neutral on this matter until the technical discussions at IALA are completed. The GLA advice to Ofcom is to wait for the outcome of these discussions before making a decision.
Question 9: If Ofcom were to enable VDES use on coastal stations, do you have comments on the potential impact of wideband VDES channels on spectrum availability in congested UK waters and any steps Ofcom might need to take to manage this? Please set out your reasoning.	Confidential? – N Our response to this question is similar to that of Question 8. Namely, this matter is an area of active discussion at IALA and the IALA DTEC WG3 will have an intersessional meeting in the summer focused on this topic, after which a clearer picture may emerge. Again, the GLA note the necessity for some form of self-coordination to allow broadcast of VDE-TER messages, whilst acknowledging that some organisations may prefer some form of time/channel allocation for “large” messages (which may include the use of ‘wideband’ 100 kHz channels) to help ensure fair use of spectrum. Currently, the GLA’s position is to remain neutral on this matter until the technical discussions at IALA are completed. The GLA advice to Ofcom is to wait for the outcome of these discussions before making a decision.
Question 10: Do you agree with our proposal to create two additional simplex channels under the CSR (International) licence, using the lower frequency portion of channels 27 and	Confidential? – N The GLA have no comments.

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28? If not, please set out your reasoning.	
Question 11: Do you have any further views on the potential time-lines for transition to digital VHF maritime radiocommunications?	Confidential? – N The GLA have no comments .
Question 12: Do you have any alternative suggestions which may have to resolve the issue of spectrum scarcity of VHF simplex channels, licensed under the CSR (International) licence in the UK?	Confidential? – N The GLA have no comments .
Question 13: Do you agree with our decision to decommission the Differential Global Positioning System licence? If not, please set out your reasoning.	Confidential? – N Given the decommissioning of the UK and Ireland DGPS service, the GLA recognise the need to, and therefore support , decommissioning of the DGPS licence. However, the GLA wish to make a clear recommendation that the DGPS frequencies (~300 kHz) are still given protection from harmful interference, as vessels in UK, Irish and wider European waters will still make use of DGPS signals from the continent.
Question 14: Do you have any comments on our general updates to the Suppliers and Demonstration terms and conditions?	Confidential? – N The GLA have no comments .
Question 15: Do you have any comments on the future spectrum needs associated with increased autonomy in the maritime sector, including MASS?	Confidential? – N The GLA have no comments .

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Question 16: Are there any other emerging technologies we should be aware of, that may drive demand for changes in UK spectrum authorisations for the maritime sector?	Confidential? – N The GLA suggest the following: • Given a growing awareness of the need to secure (authenticate) data related to navigational safety, it is likely VDE-TER will see adoption for AIS authentication purposes. The GLA have given more detailed information and reasoning for this in our answer to Question 7. • Given the increasing awareness of the need for resilient Positioning Navigation and Timing (PNT), the requirement for eLoran spectrum licencing (~ 100 kHz) is likely to grow. Here we note the need to protect this band against harmful interference, particularly from future wireless vehicle charging systems which may seek use these (and other) navigation related low frequencies. • Further to the above, the increasing need for resilient PNT may prompt the demand for VDE R-mode (ranging mode). Any such adoption of VDE R-mode will require more VHF coastal stations to be licenced in order to provide a suitable geometry to facilitate R-mode positioning.
Question 17: Are there any other reforms to the maritime spectrum licensing framework you think would be beneficial? If so, please explain.	Confidential? – N The GLA have no comments.
Question 18: Do you have any other comments on the proposals set out in this document?	Confidential? – N The GLA have no comments.