

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 PLA supports Ofcom’s proposed updates to the equipment list and associated terms and conditions for Ship Radio and Ship Portable licences. The removal of outdated or legacy equipment categories, alongside clearer and more accessible licensing information, should improve regulatory clarity, support more effective spectrum management, and maintain alignment with evolving IMO regulations and modern equipment standards. It is important that the revised framework remains sufficiently flexible and technology-neutral to accommodate future developments in maritime communications, particularly as the sector continues to move towards greater digitalisation. The PLA would not support changes that inadvertently constrain innovation or limit the adoption of emerging technologies through overly prescriptive equipment definitions or licensing conditions. From an operational perspective, the PLA notes that awareness of licensing obligations varies significantly across user groups, especially among smaller non-commercial or recreational river users. Without proportionate support and clear guidance, there is a risk that licensing records may become increasingly fragmented or outdated. This has practical implications not only for spectrum governance but also for safety-critical functions such as search and rescue coordination. The PLA would therefore support proportionate measures to improve the accuracy and completeness of licence holder information, such as periodic validation of contact details or targeted engagement with under-represented user groups. Such steps would help ensure that the benefits of the updated framework are realised consistently across all users of the Thames. Overall, the PLA considers Ofcom’s proposed updates to be a positive step, provided the framework remains

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	adaptable, operationally practical, and capable of supporting future maritime communications developments without requiring frequent further amendment.
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 PLA has no significant operational concerns regarding Ofcom’s proposed phased removal of authorisations for legacy MOB AIS and other AMRD Group B devices. Within the PLA’s area of responsibility, these devices do not currently present a material operational issue, and the proposed changes are therefore not expected to adversely affect port operations. The PLA also recognises the wider benefits of aligning UK maritime communications arrangements with evolving international standards and modern equipment requirements, particularly in relation to interoperability, spectrum efficiency, and consistency with internationally recognised frameworks. In practice, the PLA anticipates that the commercial maritime sector will transition naturally toward AMRD Group A compliant devices through normal equipment replacement cycles. Current market experience suggests that reputable suppliers are already moving away from legacy technologies, which should help minimise disruption and reduce the likelihood of a prolonged mixed-equipment environment. However, the PLA considers that the practical effectiveness of the proposed approach will depend less on the policy change itself and more on the level of awareness and compliance among non-commercial and recreational users. In a complex and mixed-use environment such as the Thames, a proportion of users may be unaware of regulatory changes or slow to adopt updated equipment standards. Without targeted communication and clear guidance, there is a risk that legacy devices could persist longer than intended. The PLA would therefore support complementary measures such as clear transition timelines, accessible guidance, and proportionate compliance activity to ensure that all user groups—particularly smaller operators

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	and less technically engaged users—understand the requirements and adopt updated equipment in a timely manner. These steps would help ensure a smooth and consistent transition across the wider maritime community.
Question 2(a): Do you have any comments on the proposed notice periods?	Confidential? – N The PLA considers the proposed notice periods to be broadly appropriate and sufficient for most operators, suppliers, and commercial users to transition away from legacy AIS MOB and AMRD Group B devices. For the majority of commercial operators on the Thames, the proposed timelines align well with typical procurement and equipment lifecycle patterns and are therefore unlikely to introduce operational risk. However, the PLA notes that the effectiveness of any transition period will depend not only on the length of notice provided but also on the accuracy of underlying licensing and contact records, the clarity of communication to users, and the practical arrangements for monitoring compliance. Notice periods alone are unlikely to ensure full adoption across all user groups, particularly among non-commercial or recreational users who may not routinely engage with licensing updates or may be slower to act on regulatory changes. The PLA would therefore support measures to strengthen the supporting mechanisms for implementation, including improvements to licence record accuracy and periodic validation of contact details. Such steps would enhance Ofcom’s ability to communicate effectively with licence holders and would also support wider maritime safety functions, including Search and Rescue coordination. The PLA also observes that, in practice, initial identification of non-compliant or interfering devices often falls to local maritime authorities, particularly where Ofcom’s own enforcement and direction-finding resources are limited. This reinforces the need for realistic, well-communicated, and enforceable transition arrangements to

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	ensure that legacy devices do not persist beyond the intended notice period. Overall, the PLA considers the proposed notice periods reasonable, provided they are supported by clear communication, improved record management, and practical arrangements to encourage compliance across the full spectrum of maritime users.
Question 3: Do you agree with our proposal to enable the deployment of Mobile Aids to Navigation under the AIS licence?	Confidential? – N The PLA is broadly supportive of Ofcom’s proposal to enable the deployment of Mobile Aids to Navigation (MAtoNs) under the AIS licence. The PLA recognises the potential for MAtoNs—including temporary, virtual, or rapidly deployable aids—to enhance navigational awareness, operational flexibility, and safety within port and Vessel Traffic Service (VTS) environments. This capability is particularly valuable in dynamic or short-term scenarios where fixed AtoN deployment may not be practical or proportionate. The proposal also has the potential to unlock additional operational and safety use cases that have previously been constrained by existing licensing arrangements. In a complex and fast-changing waterway such as the Thames, the ability to deploy MAtoNs quickly and effectively can support more responsive risk management and improve the overall resilience of navigational safety systems. However, the PLA considers that the effectiveness of this approach will depend heavily on the governance and control mechanisms associated with MAtoN deployment. In a high density traffic and safety-critical environment, it is essential that the relevant port or harbour authority retains visibility and oversight of all active AtoNs within its area of responsibility. Unnecessary, excessive, or unauthorised AIS transmissions could contribute to display clutter or operational distraction for mariners and VTS operators if not appropriately managed. The PLA would therefore support arrangements that:

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	• Ensure clear identification of MAtON operators so that port authorities can quickly determine the responsible party for any deployed device. • Provide a straightforward mechanism for investigating rogue or unauthorised transmissions to maintain the integrity of the navigational picture. • Accompany the proposal with improvements to existing AtoN administrative processes, which are currently perceived as complex and time-consuming, to ensure the framework is practical and responsive. • Promote proportionate and operationally justified deployment practices to avoid unnecessary clutter in congested waterways. Subject to appropriate governance, coordination, and streamlined administrative processes, the PLA considers the proposal to be a positive development that could support improved maritime safety and operational effectiveness.
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 PLA is broadly supportive of Ofcom’s proposal to update the AIS licence to include the two ASM channels. The PLA recognises that ASM capability is likely to form an important component of future maritime digital communications and may act as an enabling step toward wider VDES adoption and associated operational benefits. The inclusion of ASM channels has the potential to enhance the usefulness, flexibility, and timeliness of maritime information exchange, particularly where integrated with existing VTS and navigational safety services. At present, AIS congestion is not considered a significant issue within PLA operational areas; however, the PLA acknowledges that efficient implementation of ASM and VDES capability remains a strategic priority for the wider maritime sector. The proposal may also support future innovation in operational data services, digital traffic management, and enhanced situational awareness tools.

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	The PLA does not currently operate a formal policy regarding ASM usage, nor does it have immediate plans for routine operational reliance on ASM within VTS operations. Any future benefits within the Thames would depend heavily on reliable receipt and interpretation across a highly mixed user base. In practice, the challenge for the PLA is less the ability to transmit information and more the ability to verify that messages are consistently received and understood by the broad range of commercial and non-commercial river users. For this reason, ASM capability is currently viewed as a potential enhancement to existing systems rather than a replacement for established operational communications methods. The PLA would also welcome clearer guidance on the governance and assignment of ASM identifiers, including DAC numbering. While identifier management is understood to be coordinated internationally through IALA processes, practical experience suggests that the process is not always clear or consistently understood by operators. Instances of locally selected or “guessed” identifiers have historically created avoidable risks of protocol conflicts or interference. Additional clarity from Ofcom—recognising that some aspects sit outside its direct remit—would therefore support more consistent and interoperable implementation. The PLA further notes that some information categories described as “non-safety critical”, such as weather-related data, may nevertheless support operationally important functions when combined with tidal, environmental, or navigation-related information used within port operations. Subject to appropriate governance, clear guidance, and recognition of the practical interoperability challenges across mixed-use waterways, the PLA considers the proposal to be a positive and proportionate step toward supporting future maritime digital communications capability.

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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 The PLA is broadly supportive of Ofcom’s proposals to clarify the AIS licence terms and conditions. Clear, consistent, and well-structured licensing arrangements are beneficial in supporting a common understanding across operators, equipment users, and maritime organisations, and can help ensure that AIS-related obligations are interpreted and applied in a uniform manner. From the PLA’s perspective, there is currently no known material operational confusion arising from the existing AIS licence wording within its areas of responsibility. Accordingly, the PLA does not anticipate any significant operational impact arising from the proposed clarifications, provided that the revised wording remains proportionate, technology-neutral, and genuinely clarificatory in nature. The PLA would, however, emphasise the importance of ensuring that the updated terms do not unintentionally introduce new restrictions, ambiguities, or administrative burdens. As long as the changes are limited to improving clarity and consistency, rather than altering the practical scope of permitted AIS use, the PLA considers the proposals to be sensible, low-risk, and potentially beneficial in improving shared understanding across the sector.
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 PLA is broadly supportive of Ofcom’s proposal to authorise VDES channels (VDE-TER and VDE-SAT) for operation on vessels under the Ship Radio licence. The PLA recognises that VDES represents a logical and forward-looking evolution of maritime digital communications, with the potential to support higher-capacity data exchange, enhanced operational awareness, and improved resilience for maritime information services. Authorising these channels now appears to be a sensible future-proofing measure that supports international alignment and positions the UK for the gradual adoption of VDES-enabled services.

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	While the Thames Estuary and wider PLA operational environment are not currently constrained by a lack of communications options, the PLA acknowledges that VDES may provide valuable supplementary capability over time, including potential resilience benefits and support for emerging digital maritime services. At present, the PLA does not anticipate significant interoperability or spectrum-management concerns arising from the proposal, provided implementation is coordinated proportionately alongside existing AIS and maritime communication systems. However, the PLA would welcome greater clarity regarding likely implementation timelines and transitional expectations. In practice, vessel operators often retain communications equipment for extended periods, and fleet-wide technology refresh cycles can take considerable time. Clear forward planning, realistic adoption horizons, and transparent expectations will therefore be important to avoid unnecessary fragmentation between legacy and emerging systems. Overall, the PLA considers the proposal to be a positive and pragmatic step that supports longer-term maritime communications modernisation, subject to clear guidance on implementation timelines, transition expectations, and coordinated deployment alongside existing AIS services.
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 The PLA does not consider there to be a strong near-term operational demand for VDES use by UK coastal stations within its area of responsibility. While VDES offers a range of potentially valuable future capabilities—including increased maritime data capacity, enhanced digital information exchange, reduced reliance on routine voice communications, and emerging functions such as GNSS-denied ranging—its adoption across the wider maritime sector is likely to be gradual rather than immediate. In the PLA’s view, the pace of VDES uptake continues to be shaped by several factors, including:

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	• International regulatory alignment and the maturity of global standards • Spectrum allocation decisions and coordination across jurisdictions • Supplier readiness and equipment availability, which currently appear limited for shore-based infrastructure • Commercial drivers and cost considerations • The absence of carriage requirements or a compelling operational necessity for most users • The generally slow technology refresh cycle typical of the maritime industry Many of the capacity-related arguments for VDES are also geographically variable. Within PLA operational areas, communications congestion is not currently a primary constraint, and therefore there is no immediate operational pressure to transition. At present, the PLA has no formal strategy for large-scale VDES deployment at coastal stations and no short-term plans to implement the technology. The PLA's current position is to remain "VDES-ready", monitoring developments as the technology, regulatory environment, and supplier ecosystem mature. Particular interest exists in exploring VDES-based ranging and resilient PNT functions, given the increasing strategic importance of robust positioning, navigation, and timing capabilities. Given the limited maturity of shore-based VDES equipment and the evolving nature of the wider ecosystem, it remains difficult to make firm assumptions about realistic implementation timescales. The PLA therefore considers that widespread operational adoption by UK coastal stations is more likely to occur in the medium to longer term, rather than in the immediate future.
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	Confidential? – N The PLA considers that some degree of structured coordination will be necessary if VDES use is enabled for UK coastal stations. Given the potential for VDES to support

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should share VDES channels on a self-coordinated basis? Please set out your reasoning.	safety-critical or operationally significant services, a purely self-coordinated model would present material risks in complex and congested maritime environments. From the perspective of operating and maintaining shore-based communications infrastructure, individually assigned and coordinated frequencies provide greater confidence in relation to interference management, coverage assurance, service reliability, and operational accountability. Known challenges with interference and congestion in the maritime VHF environment suggest that similar issues could arise within VDES if deployments were left entirely to self-coordination without clear governance. However, the PLA recognises that a fully centralised model could introduce administrative burden or reduce operational flexibility if applied too rigidly. A proportionate approach may therefore be appropriate, balancing the need for interference protection and operational reliability with the practical need to support scalable future deployment. If shared or self-coordinated arrangements were to be considered, the PLA believes they would require: • Clearly defined coordination rules and technical standards • Effective mechanisms for interference resolution and escalation • Visibility of local deployments for relevant port and harbour authorities • Sufficient oversight to prevent uncontrolled or conflicting use An alternative approach could involve Ofcom assigning and coordinating VDES spectrum at a regional or operational level, while retaining the ability to adjust allocations over time in response to observed utilisation, operational demand, and evolving maritime activity patterns. Overall, the PLA considers that coordinated assignment—supported by proportionate governance—offers the most robust and reliable foundation for early VDES

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	deployment in UK coastal environments, particularly where safety-critical operations are involved.
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 The PLA does not currently anticipate significant VDES-related spectrum congestion within the inland parts of its operational area. Given the extended development timeline for VDES and the likely gradual pace of adoption, it appears unlikely that wideband VDES channels will create immediate congestion pressures in the Thames. However, the PLA recognises that the situation may differ in geographically sensitive or high-traffic regions, particularly in the South East where cross-border coordination with continental systems may be relevant. From an operational perspective, the PLA considers that the key requirement will be effective spectrum management to ensure that VDES deployment does not introduce unintended interference or degrade the performance of existing AIS, VHF, VTS, pilotage, or harbour craft communications. Any reduction in the reliability of these established, safety-critical services would materially weaken the case for VDES adoption. The PLA would therefore expect Ofcom to take an active role in coordination and monitoring, particularly at the boundaries of coverage areas and in regions where overlapping radio influence is likely. To manage potential risks associated with wideband VDES channels, Ofcom may need to consider measures such as: • Geographic coordination rules to prevent conflicting use in congested waters • Appropriate power limits to minimise interference risk • Clear channel allocation arrangements to ensure predictable and consistent use • Priority or protection mechanisms for safety-critical services

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	• Active monitoring of spectrum utilisation and timely investigation of interference reports If implemented correctly, VDES should enhance rather than degrade maritime situational awareness. However, this outcome is conditional on careful spectrum management and coordinated deployment. Without these safeguards, the cost–benefit case for wideband VDES would be questionable. Overall, the PLA considers that wideband VDES can be accommodated within UK coastal waters, but only if deployment is carefully coordinated, monitored, and managed to avoid adverse impacts on existing maritime communications and operational effectiveness.
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 28? If not, please set out your reasoning.	Confidential? – N The PLA supports Ofcom’s proposal to create two additional simplex channels under the CSR (International) licence using the lower-frequency portions of channels 27 and 28. The availability of additional simplex channels is likely to provide greater operational flexibility, particularly during periods of high traffic density, major events, or other scenarios where communication demand increases. This should assist VTS and port operations in maintaining effective communication capacity in a constrained spectrum environment. From a technical and navigational systems perspective, the PLA does not currently anticipate significant compatibility or interference concerns arising from the proposed reuse of channels 27 and 28, provided implementation is managed appropriately and existing users are clearly informed of the changes. Clear communication and transition guidance will be important to ensure smooth adoption. However, the PLA notes that any longer-term reduction in duplex channel availability could introduce unintended operational impacts. Duplex channels can help maintain communications discipline because standard vessel radios typically do not allow users to hear both sides of a duplex exchange. This characteristic has historically reduced the likelihood of casual or extended

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	non-operational conversations on working channels. By comparison, simplex channels may be more susceptible to congestion or misuse, even where they are formally licensed and managed. For this reason, the PLA encourages Ofcom to consider the broader balance of simplex and duplex provision within the CSR framework. Should future spectrum changes result in a wider reduction of duplex capability, it may be appropriate to retain or reallocate suitable duplex channels to preserve operational flexibility and communications discipline. Overall, the PLA considers the proposal to be reasonable and operationally beneficial, subject to appropriate implementation, clear communication with existing users, and ongoing spectrum management oversight to ensure that the wider CSR channel mix continues to support effective and resilient maritime communications.
Question 11: Do you have any further views on the potential timelines for transition to digital VHF maritime radiocommunications?	Confidential? – N The PLA considers that the transition to fully digital VHF maritime radiocommunications is likely to occur over a long-term timeframe rather than in the near future. Experience with the development and adoption of related technologies—such as VDES—indicates that maritime communications modernisation typically progresses gradually, influenced by global standardisation processes, equipment lifecycle constraints, and the inherently slow pace of technology refresh across the industry. At present, the PLA is not aware of any clear or imminent pathway toward widespread implementation of digital VHF voice communications. While technical development and industry discussion continue, there is limited evidence of sector-wide operational readiness or a compelling short-term driver for transition. The PLA would therefore caution against assuming accelerated timelines that may not align with practical adoption realities. The PLA recognises that digital VHF technologies could offer meaningful future benefits, particularly where enhanced data capability or integrated functionality—such

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	as improved transmitter identification or enhanced positional awareness—can support VTS, Search and Rescue, and wider maritime safety management. However, any transition will need to account for: • Long equipment replacement cycles across vessel fleets and shore infrastructure • Interoperability requirements between legacy and emerging systems during extended transition periods • Variable technical readiness across operators and user groups • The need to maintain highly reliable and universally understood safety communications throughout any migration Given these factors, the PLA considers digital VHF capability to be an important long-term direction of travel, but one that will require a measured, realistic approach to avoid misalignment between regulatory expectations and operational capability. Large-scale practical adoption is therefore unlikely in the immediate future.
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 PLA recognises that increasing demand for maritime communications may place additional pressure on available VHF simplex channel capacity over time, particularly within busy operational areas. While creating additional simplex channels is helpful, the PLA considers that a broader combination of improved coordination, smarter spectrum management, and gradual technical modernisation could help alleviate future scarcity without constraining operational users. Potential measures that may warrant consideration include: • Improved national and regional coordination of channel allocation and usage • Time-limited or event-based channel assignments where operationally appropriate

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	• More flexible licensing arrangements to support dynamic operational needs • Managed shared-channel approaches with appropriate oversight • Longer-term migration toward more spectrum-efficient technologies, including digital VHF capability where practical In addition, the PLA sees value in clearer differentiation between licence types. There may be opportunities to encourage non-essential or localised users—such as private marinas, clubs, or operators without regular interaction with international traffic—to utilise UK/Marina licences or alternative communication solutions rather than CSR (International) channels. This would help ensure that internationally coordinated spectrum remains available for operations that genuinely require it. The PLA also recognises the potential benefit of improved guidance to help users determine the most appropriate licence category, as current arrangements may not always make this distinction straightforward. However, the PLA emphasises that any increased sharing or dynamic allocation models would require effective governance, oversight, and coordination to ensure that operational reliability and safety-critical communications are not adversely affected. Overall, the PLA supports exploration of proportionate and operationally practical measures to improve spectrum utilisation, provided that maritime safety and service resilience remain the primary considerations.
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 The PLA has no objection to Ofcom’s decision to decommission the Differential Global Positioning System (DGPS) licence. DGPS has not formed a meaningful part of PLA operational activity for many years, and the discontinuation of the UK DGPS service in 2022 means

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	there is no practical justification for maintaining a dedicated licensing framework unless there were credible plans to reintroduce DGPS capability. From both a VTS perspective and a hydrographic perspective, DGPS is no longer required. Medium-wave DGPS services have not been widely used in hydrography for decades, and modern positioning methods—supported by multi-constellation GNSS, SBAS, and other resilient PNT techniques—have replaced the operational need for DGPS. Retaining the licence would therefore serve little operational purpose and could create unnecessary administrative overhead. On this basis, the PLA considers the proposed decommissioning to be reasonable, proportionate, and aligned with current operational reality, while also helping to streamline the regulatory framework.
Question 14: Do you have any comments on our general updates to the Suppliers and Demonstration terms and conditions?	Confidential? – N PLA has no specific comments on the proposed general updates to the Suppliers and Demonstration terms and conditions.
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 PLA considers that increasing autonomy within the maritime sector—including Maritime Autonomous Surface Ships (MASS) and Uncrewed Surface Vessels (USVs)—is likely to drive growing demand for resilient, flexible, and high-capacity communications capability over time. The PLA expects autonomous and remotely operated systems to become more common on the Thames, including within its own operational activities, particularly for survey and small-craft functions. At present, much of the high-bandwidth command, control, telemetry, and data transfer associated with MASS and USV operations is delivered through commercial communications infrastructure, such as 4G/5G networks and satellite services (including systems like Starlink), ra-

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	ther than through traditional maritime spectrum allocations. The PLA expects this pattern to continue in the near term. However, maritime spectrum will remain important, particularly where interoperability with conventional vessels and safety communications is required. For example, VHF-over-IP is already used within some USV fleets to provide operational VHF voice connectivity between uncrewed platforms and other river users. As autonomous operations scale, this requirement is likely to become more common and may increase demand for reliable, low-latency maritime channels. The PLA considers it likely that future autonomous operations will increase overall demand for communications bandwidth, resilience, and redundancy. Even relatively basic expectations—such as live-stream video, remote monitoring, sensor fusion, or enhanced situational awareness—may generate requirements beyond the capability of traditional maritime allocations alone. At the same time, the PLA notes that the operational and regulatory model for MASS remains immature, and there is currently no fully established UK approach for large-scale autonomous vessel integration. As a result, it remains difficult to define precise future spectrum requirements. The PLA therefore encourages Ofcom to maintain flexibility within future spectrum planning and to continue monitoring developments closely. Areas that may warrant early consideration include: • Spectrum resilience and fallback arrangements for autonomous operations • Interoperability between autonomous and conventional vessels • Scalability of communications capacity as autonomous operations expand • Licensing frameworks that remain adaptable and proportionate

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	The PLA continues to engage with MASS operators and industry stakeholders to better understand emerging operational models, communications requirements, and expectations associated with autonomous vessel deployment on the Thames. Overall, the PLA considers that increased autonomy will likely drive additional spectrum demand over the medium to long term, and that future frameworks should remain adaptable, proportionate, and aligned with evolving operational and safety needs.
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 PLA considers that several emerging technologies and operational trends may influence future maritime spectrum requirements over time. In particular, increasing use of hybrid communications architectures combining maritime VHF systems with commercial 4G/5G networks, satellite communications services, and IP-based communications solutions may continue to reshape operational communications models within the maritime sector. The PLA also notes the growing use of remotely operated and autonomous systems, including USVs and wider MASS-related technologies, which may increase demand for resilient command, control, telemetry, situational awareness, and safety-related communications capability. While many higher-bandwidth services currently rely on commercial or proprietary communications infrastructure rather than traditional maritime spectrum allocations, interoperability with existing maritime safety communications remains important. For example, VHF-over-IP solutions are already being used operationally to support communications between remotely operated craft and conventional maritime users. Over time, these trends may create demand for: • more flexible and integrated spectrum management approaches; • improved resilience and redundancy arrangements;

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	• additional support for data-centric maritime communications services; and • enhanced interoperability between traditional maritime and commercial communications technologies. At present, however, the PLA considers that many of these developments remain evolutionary rather than requiring immediate large-scale changes to maritime spectrum allocations.
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 PLA considers that there are several areas where further reform of the maritime spectrum licensing framework could deliver meaningful benefits, particularly in terms of usability, data quality, operational flexibility, and readiness for emerging technologies. A key priority is improving the accuracy and currency of licensing data, including mechanisms to ensure that licence-holder contact details remain up to date and that there is clearer linkage between authorised devices and responsible operators. In a complex, mixed-use environment such as the Thames, the ability to rapidly identify and contact the originator of a transmission is critical for resolving interference, safety, and operational issues. Enhanced data quality would support more effective interference resolution and strengthen overall maritime safety management. The PLA also sees value in improving the accessibility and clarity of licensing information. At present, determining the correct licence type or understanding specific conditions can require direct engagement with Ofcom, and the consistency of guidance may vary. More comprehensive, user-friendly, and operationally focused online guidance would help users determine the appropriate licence category and reduce administrative friction. This includes clearer differentiation between licence types to ensure that internationally coordinated spectrum is re-

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	served for operations that genuinely require it, while encouraging non-essential or localised users to utilise more appropriate alternatives. There are also opportunities to modernise the licensing application and management process. Some processes still rely on paper-based submissions or editable PDFs requiring proprietary software. A more integrated digital licensing portal—with clear visibility of active licences, conditions, application status, and associated documentation—would improve usability, transparency, and operational efficiency. This would also support better compliance monitoring and reduce administrative burden for both users and regulators. Looking ahead, the PLA considers that the licensing framework may need to evolve to better support: • Autonomous and remotely operated vessel operations • Flexible or scalable licensing arrangements for fleets of USVs or similar systems • Integration between maritime, satellite, IP-based, and commercial communications technologies • More dynamic operational communications requirements as digital services expand The PLA would support continued efforts to simplify administration, improve transparency, and ensure that the licensing framework remains sufficiently adaptable to accommodate future maritime technological developments—while maintaining the primacy and reliability of VHF voice communications as new capabilities are introduced incrementally.
Question 18: Do you have any other comments on the proposals set out in this document?	Confidential? – N We welcome the overall direction of the consultation, noting that the proposals are generally proportionate and aligned with the need to modernise maritime spectrum use while accommodating emerging technologies.

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	PLA would like to emphasise, however, that the effectiveness of these changes will depend on how they are applied in complex, high-density operating environments such as the Thames, where mixed traffic profiles, high utilisation, and safety-critical operations increase both the importance and sensitivity of spectrum management decisions. Across the consultation themes, our position is that innovation and spectrum efficiency must be carefully balanced with operational safety and resilience. In particular, we are clear on the importance of protecting the reliability of existing communications, managing transition risk in a mixed-equipage environment, and ensuring that new capabilities – whether AIS-based services, VDES, or emerging autonomous system requirements – are introduced in a measured, evidence-led manner. We also note that several aspects of the proposals rely on user behaviour, compliance, and effective coordination, all of which can vary significantly across the maritime domain. Continued engagement with port authorities and operational stakeholders will therefore be essential to ensure that regulatory changes remain grounded in real-world conditions and continue to support safe and effective maritime operations.