

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 RYA recognises the importance of the equipment list and terms and conditions being harmonised with international legislation to enable consistency in UK boats ability to operate overseas.
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 RYA agrees with the phased approach. The time-scales proposed are a reasonable compromise between the expected lifetime of existing equipment and making necessary changes to accommodate developing technology. Communication of licensing changes, to suppliers and boat owners, is important.
Question 2(a): Do you have any comments on the proposed notice periods?	Confidential? –N The RYA is content with the proposed notice period and recognises that there needs to be a balance between equipment not being made obsolete too quickly and not having the correct equipment, particularly for use abroad. When the announcement was first made about AMRD Group B devices, we shared this with our members/boating community.
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Question 3: Do you agree with our proposal to enable the deployment of Mobile Aids to Navigation under the AIS licence?	Confidential? – N Not all small craft have AIS. This should be considered in the use of virtual aids to navigation, where these craft would not be aware of the AtoN's existence until/unless charted, or announced through warnings or safety broadcasts.
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? – Y/N

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 Yes – agree.
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 Yes – agree.
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 RYA does not have enough information to be able to assess the size of near-term demand in relation to communication with small craft.
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-coordinated basis? Please set out your reasoning.	Confidential? – N Ofcom should individually assign channels. For channels to be shared on a self-coordinated basis, it would require control over how information is promulgated to all users that might need it.

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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? – Y/N
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 Yes – agree. Creating additional simplex channels would be beneficial for small craft.
Question 11: Do you have any further views on the potential timelines for transition to digital VHF maritime radiocommunications?	Confidential? –N The RYA agrees with the potential timelines.
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? – Y/N
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 Yes – agree.
Question 14: Do you have any comments on our general updates to the Suppliers and Demonstration terms and conditions?	Confidential? –N

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Question 15: Do you have any comments on the future spectrum needs associated with increased autonomy in the maritime sector, including MASS?	Confidential? – Y/N
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? – Y/N
Question 17: Are there any other reforms to the maritime spectrum licensing framework you think would be beneficial? If so, please explain.	Confidential? –N Changes to ship portable radio licensing to enable handheld VHF radios to be licensed for use on multiple vessels outside the UK (internationally) would be welcome.
Question 18: Do you have any other comments on the proposals set out in this document?	Confidential? – N No