

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?	The UK Chamber of Shipping supports updating the terminology to explicitly delineate AMRD Group A (Class M compliant) devices to improve regulatory clarity. However, this update must be entirely automated within Ofcom's online licensing portal without requiring retrospective manual administrative interventions or supplemental variations fees from existing licensees. The administrative text must preserve the absolute right of any crew member to deploy any available radio device during emergencies or when there is an immediate threat to the safety of life, the ship, or aircraft, without regard to the strict equipment list classifications.
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.	The Chamber disagrees, while we support reducing congestion on core AIS safety channels, the proposed 3.5-year absolute phase-out timeline to 2030 is commercially aggressive and creates an unnecessary capital burden. Fleet management operators purchase personal locator beacons and safety equipment in volume, matching standard 5-year battery/hydrostatic release service intervals or intermediate survey schedules. Cutting the transition short by early 2030 will force the premature disposal of thousands of perfectly functional safety units, creating an artificial CapEx shock for operators. We strongly recommend that the Phase 2 absolute deadline be extended to 31 December 2031, aligning with the natural decommissioning cycle of hardware purchased up to the formal rule-change statement date.
Question 2(a): Do you have any 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?	The Chamber supports, extending the AIS licensing framework to encompass physical and virtual Mobile Aids to Navigation (MAtoNs) provides critical flexibility for modern maritime operations.

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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.	The Chamber agrees that incorporating Channels ASM1 (161.950 MHz) and ASM2 (162.000 MHz) into the standard AIS licence schedule is helpful to divert non-safety telemetry (e.g., weather updates, logistics data, lock statuses) away from saturated primary AIS channels. However, Ofcom must ensure that ITU Recommendation M.2092 is strictly enforced: ASM operations must function as a dynamic Priority 2 layer, dropping instantly whenever Priority 1 core safety/navigational AIS data requires access to the data link.
Question 5: Do you agree with our proposals to clarify the AIS licence terms and conditions? If not, please set out your reasoning.	Yes
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?	Yes
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.	The Chamber sees potential for high demand in major ports and industrial maritime gateways. Major ports managing complex arrival schedules require high-capacity, low-latency digital loops for dynamic route-exchange modelling and automated port call reporting. Delaying national coastal authorisation until full global uptake occurs creates an artificial barrier to innovation and prevents UK ports from leading.
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.	The Chamber believes that Ofcom individually assigning and coordinating VDES frequencies will add unnecessary complexity in having to look up and then set the correct channel for a specific port. The technology now exists for stations to scan the band and find a free channel or slot. There should be sufficient handshaking etc to identify whether the data has been correctly received or needs to be repeated.

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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.	No comment – unreasonable to ask for speculation on a very embryonic system.
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.	The Chamber supports with conditions. Option 3 delivers a helpful short-term release valve for immediate, localised port communication congestion without completely removing the duplex reserves required for future digital voice testing. However, Chamber support is strictly conditional on Ofcom directly compensating and coordinating transitions for the 28 specific licensees who currently rely on the duplex profiles of Channels 27 and 28. These operators must be given seamless access to equivalent, clean duplex assignments without facing administrative backlogs or equipment modification penalties.
Question 11: Do you have any further views on the potential timelines for transition to digital VHF maritime radiocommunications?	The Chamber recommends a unified transition post-2031. A piecemeal transition to digital voice will compromise safety at sea. The maritime sector cannot support an environment where fractured regional standards dictate whether a vessel can voice-call a port. Timelines must lock directly into the international ITU WRC-31 cycle, establishing a synchronised transition window between 2031 and 2035. This ensures that hardware updates are deployed globally, protecting international interoperability.
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?	NA

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Question 13: Do you agree with our decision to decommission the Differential Global Positioning System licence? If not, please set out your reasoning.	The UK Chamber agrees that modernised multi-constellation GNSS platforms deliver more than enough localised accuracy (<2m) for safe commercial navigation without requiring legacy, land-based LF/MF differential augmentation signals. Given the service was formally shut down by the GLAs in March 2022 and matches similar global decommissioning trends (such as Norway's 2026 shutdown), maintaining this specialised licence type is unnecessary.
Question 14: Do you have any comments on our general updates to the Suppliers and Demonstration terms and conditions?	NA
Question 15: Do you have any comments on the future spectrum needs associated with increased autonomy in the maritime sector, including MASS?	NA
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?	The Chamber emphasises the rapid expansion of direct-to-device satellite arrays and low-Earth orbit (LEO) high-bandwidth satellite networks across the commercial fleet. Future iterations of the Ship Radio Licence should consider how to bridge the gap between traditional maritime mobile service allocations and these hybrid commercial satellite broadband terminals to ensure fleet communications remain covered under a single, unified authorisation framework.
Question 17: Are there any other reforms to the maritime spectrum licensing framework you think would be beneficial? If so, please explain.	NA
Question 18: Do you have any other comments on the proposals set out in this document?	The Chamber asserts that under section 108 of the Deregulation Act 2015, Ofcom is bound by a strict statutory "Growth Duty" to ensure that regulatory interventions do not disproportionately choke commercial activity. Shipping handles approximately 85% of international UK

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	trade volume. Any changes to the maritime radio spectrum framework must actively support, rather than hinder, the deployment of next-generation digital tech that keeps the UK fleet efficient, safe, and competitive on the global stage.