

Your response

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Question 1: Do you have any comments on our impact assessments as set out in Annex 1? Please specify whether your comments relate to: • our wider impact assessment; • our equality impact assessment; or • our Welsh language impact assessment.	Confidential? - N Our comments relate to the wider impact assessment. We broadly support the assessment, but consider that it should more explicitly address the potential impact on incumbent Business Radio users if the interim arrangements were later expanded, the coordination methodology changed, or spectrum were repurposed. Existing systems may support mission-critical and safety-critical communications. Any displacement could require a long, complex and costly transition. The impact assessment should therefore recognise incumbent protection, continuity of service, transition timescales and the source of funding for any migration as material considerations.
Question 2: Do you agree with our assessment of the 450 MHz and 5030-5091 MHz bands for drone control links? Do you agree there is demand for these bands in the UK (please identify any relevant use cases and locations in your response)? Are there any other frequency bands we should consider for control links?	Confidential? - N We broadly agree with the assessment of the 450 MHz band as a technically useful option for longer-range command and control links, particularly in remote and rural areas where mobile coverage may be limited. We recognise potential use cases such as medical and essential-supplies delivery, infrastructure inspection and other BVLOS operations in remote or mountainous locations. Our support is conditional on the availability analysis and coordination assumptions remaining as stated. The consultation's mapping indicates very limited or no 450 MHz availability in many parts of southern England and other densely used areas. On that basis, the proposal should not adversely affect incumbent operations in those locations. Our meeting focused on 450 MHz. We have no additional evidence to offer on demand for 5030-5091 MHz or on alternative control-link bands.
Question 3: Do you have any comments on our proposed approach to coordinating drones with other users of the 450 MHz band? In your response, please indicate whether it relates to co-channel or adjacent channel use, and provide evidence for any coexistence issues raised.	Confidential? - N We support the proposed coordination approach in principle, subject to robust and continuing protection of incumbent Business Radio users. Co-channel use: licences should be granted only where Ofcom's planning methodology demonstrates that the relevant field-strength or interference threshold will not be

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	exceeded at protected incumbent receivers. The spectrum-availability analysis and the assumptions used to create the maps should be applied consistently and should not be relaxed without further consultation. Adjacent-channel use: drone equipment should meet the same applicable radio-equipment standards and emission-performance requirements as equipment already authorised in the band. Coordination should account for the greater propagation range of an airborne transmitter and for aggregate effects where several base stations or aircraft are authorised within or near a designated service area. Incumbent Business Radio use, particularly mission-critical and safety-critical services, should remain the priority use of the band. A drone authorisation should not prevent a justified new or changed incumbent assignment. Where harmful interference is reported, Ofcom should be able to require immediate suspension of the relevant drone transmissions while the issue is investigated, rather than relying only on eventual licence revocation.
Question 4: Do you have any comments on our proposed 450 MHz drone authorisation approach? Please provide any specific views (including technical justification where relevant) on: • the proposed technical conditions, including operating height AGL, power, channel bandwidth, designated service area, and number of base stations; • the proposed non-technical conditions, including licence fees and term, frequency flexibility and complying with CAA rules and radio equipment standards; and • reviewing our initial authorisation approach.	Confidential? - N We support a limited, reviewable 450 MHz authorisation provided the initial safeguards are retained. Technical conditions - Retain the proposed 100 m above-ground-level operating limit used for planning and licensing. Any higher operation should require a fresh coordination assessment. - Retain the proposed power, channel-bandwidth and equipment-standard controls, and apply the published interference methodology consistently. - Authorisations should be geographically bounded to a defined service area and to the minimum necessary number of coordinated base stations. The licence should not be treated as permitting nationwide operation. - The effect of linked base stations, airborne propagation and aggregate use should be assessed before grant or variation. Non-technical conditions - Business Radio incumbents should remain the priority users of the shared spectrum, especially where systems support mission-critical or safety-critical services. - Compliance with CAA operating requirements and applicable radio-equipment standards should be an express and ongoing condition.

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	- The licence should include an immediate suspension power where harmful interference, safety or security concerns arise. A one-year revocation notice may be suitable for orderly withdrawal in normal circumstances, but it is too slow as the sole response to an urgent interference or security issue. - Any licence fee should recover appropriate regulatory and coordination costs and should not transfer the cost of displacement or remediation to incumbent users or the taxpayer. Review - Review the approach within the proposed initial period and publish evidence on interference cases, suspensions, channel availability and effects on incumbents. - Do not relax the coordination assumptions, extend the operating envelope, or move towards exclusive drone use without a further consultation and a full assessment of incumbent transition impacts, costs and timescales.
Question 5: Do you have any comments on our proposed 5030-5091 MHz drone authorisation approach? Please provide any specific views (including technical justification where relevant) on: • the portion of the band proposed for early release (5040-5060 MHz); • the proposed technical parameters and approach to coordinating drones and/or protecting other users of the band; and • the proposal to phase out licences once there is global harmonisation, the required transition period and sunset clause.	Confidential? - N No comment. Our review and meeting discussion focused on the proposed use of the 450 MHz band.
Question 6: Do you have comments on our proposal to create a new drone detection radar licence for the 24 GHz band, including the proposed technical and non-technical conditions, the proposed draft licence in Annex 12, and our coexistence analysis in Annex 6? Please provide evidence for any issues raised.	Confidential? - N No comment. Our review and meeting discussion focused on the proposed use of the 450 MHz band.

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Question 7: Do you have comments on our proposal to create a new drone detection radar licence for the 16 GHz band on a case-by-case basis, including the proposed technical and non-technical conditions and proposed draft licence in Annex 12? Please provide evidence for any issues raised.	Confidential? - N No comment. Our review and meeting discussion focused on the proposed use of the 450 MHz band.
Question 8: Have you identified any other frequency bands we should consider for drone control links in the longer term?	Confidential? - N We have not identified an additional control-link band through this review. Any future proposal should be supported by a coexistence assessment and should protect incumbent mission-critical and safety-critical services.
Question 9: Do you have any comments related to the existing satellite frequencies available for drone control links?	Confidential? - N No comment.
Question 10: What are your needs and priorities for accessing spectrum for drone safety? Do you have interest in future use of 15 GHz and/or 76 GHz, or other specific frequencies and bands for similar drone safety use?	Confidential? - N Our priority is reliable access to spectrum for safety, security and continuity-of-service applications without degradation of existing mission-critical radio services. We have no specific evidence to submit on future use of 15 GHz, 76 GHz or other bands.
Question 11: Do you have any interest in ground based UAT to complement the aerial component in 978 MHz licences?	Confidential? - N No current interest identified through this review.
Question 12: Are you interested in or do you have any plans to trial the use of ISAC for drone detection purposes?	Confidential? - N No current plans identified through this review.
Question 13: Do you have any other comments on this consultation document?	Confidential? - N Overall, we are content for Ofcom to proceed with interim 450 MHz authorisations provided the published availability assessment, 100 m AGL limit, coordination methodology, technical standards and geographic controls remain in place. The framework should make clear that incumbent Business Radio users retain priority, that harmful interference

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	can trigger immediate suspension while investigated, and that any future material change or repurposing would require further consultation and a funded, practicable transition plan for affected incumbents.