

Your response

Question	Your response
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 Echodyne broadly agrees with Ofcom’s wider impact assessment that the proposals for drone detection radar at 16 GHz and 24 GHz will promote efficient use of spectrum by bringing additional use to these bands while having very little impact on existing users.³ The assessment correctly identifies that the proposals will support public safety and security objectives by enabling organisations to deploy systems capable of detecting drone activity.⁴ However, Echodyne respectfully submits that the impact assessment may understate the urgency and magnitude of the public safety benefits associated with drone detection radar. The threat posed by malicious and unauthorised drone activity is escalating worldwide, driven by the increasing accessibility and sophistication of UAS platforms.⁵ Both the UK Government and the European Commission have recognised this challenge and taken steps to strengthen detection and counter-drone capabilities.⁶ U.S. experience confirms this assessment: public safety organisations, utilities, law enforcement, and first responders have identified drone detection radar as performing a critical function in protecting public safety and critical security interests. Echodyne encourages Ofcom to recognise the important public safety and security benefits of drone detection radar systems and to enable their timely deployment through the proposed licencing regime for drone detection radar. Echodyne has no comments on the equality impact assessment or the Welsh language impact assessment.
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	Confidential? – N Echodyne agrees with Ofcom’s assessment of the 450 MHz and 5030–5091 MHz bands for drone control links. From Echodyne’s perspective as a drone detection radar manufacturer, the expansion of authorised drone control spectrum is closely connected to the need for

³ See Consultation Document at A1.8.

⁴ See *id.* at A1.9.

⁵ See *id.* at 6.2.

⁶ *Id.*

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locations in your response)? Are there any other frequency bands we should consider for control links?	corresponding growth in authorised drone detection capabilities. As more drones operate in UK airspace, especially BVLOS, the demand for effective airspace awareness and detection systems will increase proportionally. Echodyne therefore encourages Ofcom to consider the drone detection radar and drone control link proposals as complementary elements of a unified spectrum framework for the safe integration of drones into UK airspace.
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 Echodyne does not have specific comments on the proposed coordination approach for the 450 MHz band, as this band relates to drone control links rather than detection radar.
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 Echodyne has no comments on the specific conditions for the 450 MHz drone authorisation approach.
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:	Confidential? – N Echodyne has no comments on the specific conditions for the 5030-5091 MHz drone authorisation approach.

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• 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.	
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 Echodyne strongly supports Ofcom’s proposal to create a new drone detection radar licence authorising drone detection radar at 24 GHz (24.05–24.25 GHz).⁷ This proposal addresses a critical and growing need to protect critical national infrastructure, public events, and sensitive locations from malicious or unauthorised drone activity. Echodyne’s experience at 24 GHz. Echodyne’s EchoGuard radar operates in the adjacent 24.45–24.65 GHz band. The EchoGuard has been deployed extensively for over five years across public safety, defence, and critical infrastructure applications in the U.S., with no reported cases of harmful interference to existing services. This extensive operational track record provides strong real-world evidence that drone detection radar systems operating in the 24 GHz range can coexist effectively with incumbent users. Coexistence analysis. Echodyne agrees with Ofcom’s assessment that the risk of harmful interference to co-channel services, including amateur services, level crossing radar, automotive short-range radar, and speed cameras, is low.⁸ Echodyne’s experience in the U.S. confirms that radar systems operating in this frequency range, when properly designed with electronically scanning phased array technology and highly directional beams, present minimal interference risk. Ofcom’s measurement results showing no harmful interference

⁷ See *id.* at 6.6; Ofcom, Drone Detection Radar Licence (Draft), Consultation and Call for Input (July 16, 2026) (“Draft Radar Licence”)

⁸ See Consultation Document at 6.9.

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	between drone detection radar and speed cameras at distances as close as 50 metres provide further confidence in the low-risk coexistence environment.⁹ More broadly, Echodyne’s operational experience in the adjacent 24.45–24.65 GHz band has produced no reported cases of harmful interference to any incumbent service. Radio astronomy. Rather than adopting Ofcom’s proposed 1 km exclusion zone around each radio astronomy site,¹⁰ Echodyne recommends a coordination-based approach. Ofcom’s coexistence analysis confirms that the impact zone for drone detection radar channels operating in the out-of-band (“OOB”) emission domain is typically 0.7 km, and for channels in the spurious domain, approximately 0.1 km.¹¹ Thus, a blanket 1 km exclusion zone may limit deployment flexibility. Each site may have distinct characteristics that affect system performance, such as local obstructions or interference sources, making a site-specific evaluation appropriate. Technical conditions. Echodyne supports the proposed technical conditions in Table 6.1, including permitted frequencies of 24.0675–24.2325 GHz, maximum bandwidth of 50 MHz, and maximum out-of-band emissions in the 23.6–24 GHz band of -45.2 dBW/MHz.¹² With respect to maximum permitted power levels, Echodyne notes an inconsistency between the consultation text and the Draft Radar Licence regarding the expression of the maximum power limit for 24 GHz drone detection radar. Table 6.1 of the consultation specifies a maximum EIRP of 23.9 dBW, whereas Schedule 1 of the Draft Radar Licence specifies 23.9 dBW ERP, which is equivalent to 26.05 dBW EIRP.¹³ Echodyne recommends that Ofcom resolve this inconsistency by specifying the maximum radiated power in terms of EIRP. Echodyne also requests that Ofcom consider increasing the maximum levels from 26.05 dBW to a value as high as 30 dBW EIRP. While Echodyne’s 24 GHz radars are designed to operate at approximately the proposed 26 dBW EIRP limit, additional headroom would simplify

⁹ See *id.* at A6.38.

¹⁰ See *id.* at 6.10.

¹¹ See *id.* at A6.31.

¹² See *id.* at 6.12.

¹³ See *id.*; Draft Radar Licence, Schedule 1 at 3.

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	compliance and support increased performance and resolution. A maximum power limit of 30 dBW EIRP would enable these positive results without meaningful impact to other services, consistent with Ofcom's coexistence analysis confirming a low risk of harmful interference in this band. Non-technical conditions. Echodyne offers the following observations: • <i>Indefinite licence term with five-year revocation notice:</i>¹⁴ Echodyne supports this approach, which offers the regulatory and investment certainty necessary to support the deployment of drone detection capabilities. In doing so, it helps create an environment where radar operators can continue to innovate, adapt to emerging needs, and deploy new technologies, ultimately delivering benefits to consumers and the broader public interest. • <i>Cost-based annual fee of £75:</i>¹⁵ Echodyne considers this fee level reasonable and proportionate, particularly given the public safety objectives of the licence. • <i>UK-wide authorisation for 24 GHz:</i>¹⁶ Echodyne strongly supports a UK-wide authorisation rather than site-specific licencing for the 24 GHz band. Echodyne's U.S. experience demonstrates that site-specific licencing for drone detection radar is impractical and inconsistent with how these systems are deployed operationally. Effective siting of radars can change due to environmental conditions, seasonal change, foliage growth, and surrounding construction. Many deployments involve radars mounted on trailers transported to various locations and operated from stationary positions for periods of days or weeks to support security at public events or in response to unexpected drone incursions. Site-specific licencing would require a modification of licence if a radar needed to be re-sited by a few hundred yards to see around a newly constructed building.

¹⁴ See *id.* at 6.21(a).

¹⁵ See *id.* at 6.21(b).

¹⁶ See *id.* at 6.21(c).

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	Relocating radars over such short distances would not alter coordination determinations. • <i>Tradability</i>:¹⁷ Echodyne supports the proposal to permit total transfer of spectrum rights and obligations to another party. • <i>Record keeping</i>:¹⁸ Echodyne supports maintaining accurate records of equipment deployment locations and recognises that deployment data may assist Ofcom in spectrum management and compliance activities. At the same time, the draft licence would require licencees to submit detailed deployment information, including precise grid references to 10-metre resolution.¹⁹ Because drone detection radar is frequently deployed to protect critical infrastructure, public events, and other security-sensitive locations, Echodyne encourages Ofcom to ensure that robust confidentiality protections apply to such information and that reporting obligations remain proportionate to the low interference risk presented by these deployments. Doing so would help preserve the flexibility and administrative efficiency of a UK-wide authorisation while continuing to provide Ofcom with access to the information necessary to support effective spectrum management. <i>Non-interference, non-protected basis.</i> Echodyne notes that the draft licence provides that radio equipment will operate on a non-interference, non-protected basis.²⁰ Echodyne recognises that this is a standard licencing approach and does not object to its application in this context. At the same time, drone detection radar is increasingly being deployed to support the protection of critical infrastructure, public events, and other sensitive locations. As deployment increases, Echodyne encourages Ofcom to monitor whether interference issues arise in practice and to assess whether the regulatory framework continues to remain appropriate considering the operational role these systems serve. Should reliance on drone detection radar systems for

¹⁷ See *id.* at 6.21(d).

¹⁸ See *id.* at 6.21(e).

¹⁹ See Draft Radar Licence at 2.

²⁰ See *id.*

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	public safety functions grow significantly over time, Echodyne encourages Ofcom to keep the regulatory framework under review and to consider whether additional protections or other measures may be warranted. Additional Technical Observations. Echodyne offers the following observations regarding the proposed technical conditions applicable to 24 GHz drone detection radar. Echodyne's EchoGuard radar is designed to operate with a peak maximum effective radiated power of approximately 246 W (23.9 dBW), a bandwidth of approximately 45 MHz, and an antenna gain of approximately 20 dBi. The system utilises electronically scanning phased-array technology and provides scanning coverage of approximately 120° in azimuth. These characteristics appear generally consistent with the assumptions underlying Ofcom's coexistence analysis. • <i>Tuning range.</i> Echodyne understands that the proposed tuning range of 24.0675-24.2325 GHz falls within the broader 24.05-24.25 GHz band identified by Ofcom for drone detection radar and should be sufficient to accommodate the three operational channels commonly used by systems operating in this spectrum. • <i>Bandwidth.</i> Echodyne understands that the proposed maximum bandwidth of 50 MHz is broadly aligned with the operational characteristics of currently available drone detection radar systems. • <i>Out-of-band emissions.</i> Ofcom proposes an out-of-band emission limit of -45.2 dBW/MHz in the 23.6-24 GHz band to protect Earth Exploration Satellite Service operations. Echodyne supports measures that facilitate efficient spectrum sharing while ensuring protection of incumbent services. Echodyne's existing 24 GHz radar products are designed to meet the U.S. specification of -13 dBm (-43 dBW) measured in 1 MHz for U.S. regulations so the proposed maximum out-of-band emission ("OOBE" in the consultation) of -45.2 dBW/MHz is achievable depending on required test methodologies. • <i>Mounting height and Antenna Parameters.</i> Echodyne notes that Ofcom's coexistence

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	analysis modelled drone detection radar at heights of up to 50 m AGL, while measurement testing was conducted at approximately 10 m AGL. Ofcom also assumed approximately 20 dBi antenna gain and a scan of roughly 120° in azimuth several times per second for modelling purposes. The consultation does not propose a fixed mounting-height restriction. Echodyne supports this approach, as deployment heights will necessarily vary based on the operational environment, terrain, and the nature of the site being protected. Maintaining deployment flexibility will help ensure that radar systems can be positioned to achieve the intended detection performance while continuing to operate within the proposed technical framework. • <i>Conformity and standards.</i> The Draft Radar Licence requires compliance with the Radio Equipment Regulations 2017.²¹ Echodyne's 24 GHz equipment conforms with EN 303 440 (modified to remove power level) and the Radio Equipment Regulations 2017. • <i>Coexistence with speed measurement devices.</i> Echodyne notes Ofcom's measurement results at its Baldock test facility, which indicated no harmful interference to speed enforcement devices at separation distances as close as 50 metres. These findings provide useful empirical support for the ability of drone detection radar systems to coexist with other users of the 24 GHz band under appropriate technical conditions.
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 Echodyne strongly supports Ofcom's proposal to authorise drone detection radar in the 16 GHz band (15.7–16.4 GHz). Echodyne's EchoShield radar system operates in the 15.7–16.55 GHz band, which overlaps significantly with the proposed authorisation range. The following channels are available with our current EchoShield radar. Note that a single radar requires only a single channel to operate. Typically, CUAS operations

²¹ See Draft Radar Licence at 2.

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	utilise the Radiolocation channels at 15.750 – 16.550 GHz center frequencies: <table><tr><th>Mode</th><th>Channel</th><th>Center Freq (GHz)</th><th>25 MHz</th><th>50 MHz</th></tr><tr><td rowspan="5">Radio Navigation</td><td>L1</td><td>15.450</td><td>Yes</td><td>No</td></tr><tr><td>L2</td><td>15.500</td><td>Yes</td><td>Yes</td></tr><tr><td>L3</td><td>15.550</td><td>No</td><td>Yes</td></tr><tr><td>L4</td><td>15.600</td><td>Yes</td><td>Yes</td></tr><tr><td>L5</td><td>15.650</td><td>Yes</td><td>No</td></tr><tr><td rowspan="17">Radio Location</td><td>U1</td><td>15.750</td><td>Yes</td><td>No</td></tr><tr><td>U2</td><td>15.800</td><td>Yes</td><td>Yes</td></tr><tr><td>U3</td><td>15.850</td><td>No</td><td>Yes</td></tr><tr><td>U4</td><td>15.900</td><td>No</td><td>Yes</td></tr><tr><td>U5</td><td>15.950</td><td>No</td><td>Yes</td></tr><tr><td>U6</td><td>16.000</td><td>No</td><td>Yes</td></tr><tr><td>U7</td><td>16.050</td><td>No</td><td>Yes</td></tr><tr><td>U8</td><td>16.100</td><td>No</td><td>Yes</td></tr><tr><td>U9</td><td>16.150</td><td>No</td><td>Yes</td></tr><tr><td>U10</td><td>16.200</td><td>No</td><td>Yes</td></tr><tr><td>U11</td><td>16.250</td><td>No</td><td>Yes</td></tr><tr><td>U12</td><td>16.300</td><td>No</td><td>Yes</td></tr><tr><td>U13</td><td>16.350</td><td>No</td><td>Yes</td></tr><tr><td>U14</td><td>16.400</td><td>No</td><td>Yes</td></tr><tr><td>U15</td><td>16.450</td><td>No</td><td>Yes</td></tr><tr><td>U16</td><td>16.500</td><td>Yes</td><td>Yes</td></tr><tr><td>U17</td><td>16.550</td><td>Yes</td><td>No</td></tr></table> EchoShield has received FCC equipment authorisation and has been deployed for CUAS applications across multiple environments, including urban, suburban, and rural settings. Case-by-case coordination with the Ministry of Defence (“MOD”). Echodyne understands the rationale for case-by-case coordination with the Ministry of Defence, given that the MOD is the primary user of the 15.4-17.7 GHz band.²² In the U.S., Echodyne routinely participates in coordination processes through the National Telecommunications and Information Administration’s Interdepartment Radio Advisory Committee (“IRAC”) for operations in comparable frequency bands and has experience operating within government spectrum coordination frameworks. That experience demonstrates	Mode	Channel	Center Freq (GHz)	25 MHz	50 MHz	Radio Navigation	L1	15.450	Yes	No	L2	15.500	Yes	Yes	L3	15.550	No	Yes	L4	15.600	Yes	Yes	L5	15.650	Yes	No	Radio Location	U1	15.750	Yes	No	U2	15.800	Yes	Yes	U3	15.850	No	Yes	U4	15.900	No	Yes	U5	15.950	No	Yes	U6	16.000	No	Yes	U7	16.050	No	Yes	U8	16.100	No	Yes	U9	16.150	No	Yes	U10	16.200	No	Yes	U11	16.250	No	Yes	U12	16.300	No	Yes	U13	16.350	No	Yes	U14	16.400	No	Yes	U15	16.450	No	Yes	U16	16.500	Yes	Yes	U17	16.550	Yes	No
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²² See Consultation Document at 6.13.

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	that coordination can be implemented efficiently when the process is transparent and well defined. Echodyne therefore encourages Ofcom to work with the MOD to establish clear timelines, criteria, and procedural expectations for coordination requests, so that applicants have greater predictability regarding the review process and any conditions that may apply. Echodyne is prepared to comply with this obligation. Technical conditions. Echodyne supports the proposed technical conditions in Table 6.2, including permitted frequencies of 15.7–16.4 GHz, maximum bandwidth of 50 MHz, and maximum EIRP of 53 dBW.²³ EchoShield operates at a peak maximum transmitter power output of 180 W and a peak maximum effective radiated power of approximately 55 kW (approximately 47.4 dBW ERP, or approximately 49.6 dBW EIRP), which would fall within the proposed 53 dBW maximum power limit whether that limit is expressed in EIRP or ERP. Further clarification of the power metric is discussed below. • <i>Upper frequency limit clarification.</i> Echodyne notes an apparent discrepancy between the upper frequency limit identified in Table 6.2 of the consultation (16.4 GHz)²⁴ and the upper frequency limit specified in Table 1 of the draft licence in Annex 12 (16,600 MHz, i.e., 16.6 GHz).²⁵ Because these provisions describe different permitted frequency ranges, Echodyne respectfully requests that Ofcom confirm the intended upper band edge and clarify the frequency range that would be available for operation under the proposed licence. • <i>EIRP/ERP clarification.</i> As with the 24 GHz proposals, Echodyne notes an inconsistency regarding the expression of the maximum power limit for 16 GHz drone detection radar. Table 6.2 of the consultation specifies a maximum EIRP of 53 dBW, while Schedule 1 of the Draft Radar Licence specifies 53 dBW ERP. Because EIRP exceeds ERP by approximately 2.15 dB for a given transmission, these are not equivalent limits and may result in different compliance obligations.

²³ See *id.* at 6.20.

²⁴ See *id.*

²⁵ See Draft Radar Licence at 3.

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	Echodyne recommends that Ofcom resolve this inconsistency by specifying the maximum radiated power in terms of EIRP. • <i>Minimum operational power.</i> Echodyne notes that the minimum transmit power that still meets detection performance requirements for its 16 GHz product is approximately 79 dBm (49 dBW) EIRP, based on nominal power at maximum gain. Echodyne therefore encourages Ofcom, in finalising the licence, to ensure that the maximum power limit continues to accommodate this level of operation under whichever metric is adopted. Area-defined authorisation. Echodyne notes Ofcom's proposal that 16 GHz licences would be area-defined, reflecting the need to coordinate with the MOD.²⁶ Echodyne understands the rationale for this approach and the practical reality that authorised operating areas may be tailored to specific deployment locations. At the same time, Echodyne encourages Ofcom to ensure that area definitions and coordination arrangements remain sufficiently flexible to accommodate reasonable operational adjustments. Factors such as environmental conditions, seasonal vegetation changes, surrounding construction, and evolving operational requirements can necessitate repositioning radar systems, sometimes on short notice. A flexible approach would help ensure that licencees can adapt deployments as needed without triggering unnecessary administrative or coordination burdens where the underlying interference environment has not materially changed. Fixed use only. Echodyne notes Ofcom's understanding that the MOD currently envisages authorising the 16 GHz band for fixed deployments only.²⁷ While Echodyne appreciates the coordination considerations associated with operation in a band heavily used by the MOD, the company encourages Ofcom and the MOD to consider whether temporary-fixed and mobile deployments could also be accommodated within the coordination framework. Echodyne's operational experience demonstrates that drone detection radar is not solely a fixed-site technology.

²⁶ See *id.* at 6.21(c).

²⁷ See *id.*

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	Many deployments involve systems mounted on trailers or vehicles that are transported to a location and operated from a stationary position for periods ranging from a few days to several weeks, such as to support public events, protect critical infrastructure, respond to security incidents, or address emerging operational requirements. Echodyne's experience in deploying drone detection radars at sporting events such as the FIFA World Cup, Super Bowl, etc. is a key example of where mobile deployment, operated by either federal or local law enforcement are ideal. Echodyne regularly has a presence at such large events in the U.S. In addition, even fixed deployments may require periodic repositioning to account for changes in terrain, seasonal foliage growth, construction activity, or other factors affecting radar performance and coverage. Echodyne therefore encourages Ofcom to ensure that the authorisation framework provides sufficient flexibility to accommodate temporary-fixed and mobile use cases, subject to any coordination measures necessary to protect MOD operations. Such an approach would better reflect how drone detection radar systems are deployed in practice while preserving the spectrum management objectives underlying the proposed coordination regime. <i>Additional Technical Observation - Radio Astronomy Compliance.</i> Ofcom's proposed 16 GHz authorisation requires compliance with the power flux density limit of -156 dBW/m^2 in 15.35–15.4 GHz at any radio astronomy site for no more than 2% of the time, as specified in ITU Radio Regulations footnote 5.511F.
Question 8: Have you identified any other frequency bands we should consider for drone control links in the longer term?	Confidential? – N Echodyne's primary area of expertise is drone detection radar rather than drone control links. However, Echodyne believes that the development of spectrum solutions for drone control links should be considered alongside the development of spectrum access frameworks for drone detection radar, as both are important components of a safe, secure, and integrated drone ecosystem. Echodyne notes that, in the U.S., policymakers have considered spectrum solutions for drone command-and-control operations in parallel with efforts to establish regulatory frameworks for drone detection technologies,

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	including radiolocation operations in the 24.45-24.65 GHz band. This broader approach recognises that the continued growth of drone operations will depend both on reliable control-link communications and on the availability of technologies that can detect and monitor drone activity. While Echodyne does not take a position on specific frequency bands for drone control links, it encourages Ofcom to consider those requirements as part of a broader spectrum strategy that supports both drone operations and the technologies needed to enable their safe and secure integration into the airspace environment.
Question 9: Do you have any comments related to the existing satellite frequencies available for drone control links?	Confidential? – N Echodyne has no comments on the existing satellite frequencies available for drone control links.
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 Echodyne’s primary contribution to drone safety is through ground-based detection radar, which provides airspace awareness and the capability to detect both cooperative and non-cooperative aircraft, including unauthorised drones around sensitive sites, critical infrastructure, and public events. While Echodyne’s current product portfolio is focused on ground-based systems, the company has also supported the development of regulatory frameworks for aeronautical mobile radiolocation operations. Such frameworks could enable future airborne detection applications, including the use of drones carrying radar to identify, track, and locate rogue or unidentified drones. Echodyne would welcome Ofcom’s consideration of similar capabilities as part of the long-term evolution of the UK’s drone safety framework.
Question 11: Do you have any interest in ground based UAT to complement the aerial component in 978 MHz licences?	Confidential? – N Echodyne supports the development of ground-based universal access transceiver (“UAT”) infrastructure to complement the aerial component at 978 MHz. Enhanced electronic conspicuity improves the situational

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	awareness picture for all airspace participants, supporting the safe scaling of BVLOS operations. As BVLOS drone traffic increases, so does the demand for drone detection radar systems that can identify non-cooperative aircraft, those that do not carry or have disabled their transponder or UAT equipment. Ground-based UAT and drone detection radar are therefore complementary capabilities.
Question 12: Are you interested in or do you have any plans to trial the use of ISAC for drone detection purposes?	Confidential? – N Echodyne notes that integrated sensing and communication (“ISAC”) technology, which proposes to use mobile network infrastructure for drone detection, remains in early development. 3GPP standardisation work on sensing-capable mobile networks is ongoing, and the European Conference of Postal and Telecommunications Administrations (“CEPT”) consultation on the relevant regulatory framework is not expected until July 2027 at the earliest. While ISAC may offer a complementary drone detection capability in the longer term, it should not be treated as a substitute for purpose-built drone detection radar. Dedicated radar systems offer proven detection capability that is available today, operates independently of mobile network coverage and capacity, and can be deployed at specific sites of concern with known performance characteristics. Echodyne encourages Ofcom to proceed with authorisation of dedicated drone detection radar on the timeline proposed in this Consultation, without conditioning that authorisation on the future availability of ISAC-based alternatives that may or may not come to fruition.
Question 13: Do you have any other comments on this consultation document?	Confidential? – N Echodyne offers the following additional observations. International alignment. Echodyne welcomes Ofcom’s consideration of international developments in formulating its proposals, including the FCC’s approach to the 24 GHz band. Regulatory alignment between the United Kingdom and other major markets, particularly the U.S., can benefit manufacturers, operators, and the broader drone ecosystem by supporting equipment

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	interoperability, reducing barriers to deployment, and promoting economies of scale. Echodyne encourages Ofcom to continue engaging with its international counterparts to promote alignment where appropriate while taking account of UK-specific spectrum requirements. <i>Ad hoc licencing during the consultation period.</i> Echodyne notes Ofcom's willingness to consider ad hoc licencing requests during the period before final decisions are adopted. Echodyne supports this approach. Given the pace of innovation in the drone sector and the growing importance of drone detection capabilities for public safety and security, enabling access to spectrum on a case-by-case basis pending the establishment of a permanent framework represents a practical and proportionate interim measure. <i>Licencing flexibility as a general principle.</i> Across Echodyne's extensive experience in the U.S., the most significant challenge to the effective deployment of drone detection radar has often been the lack of flexibility in licencing and authorisation frameworks. Echodyne therefore encourages Ofcom to incorporate appropriate flexibility into its framework from the outset, particularly for the 24 GHz band, where a UK-wide authorisation is proposed. Flexible licencing arrangements can enable deployers to respond more effectively to evolving operational and security requirements while avoiding administrative processes that do not materially contribute to interference management objectives. <i>Support for Ofcom's objectives.</i> Finally, Echodyne expresses its strong support for Ofcom's overarching objectives in this consultation, namely to enable drone innovation, promote efficient spectrum use, and enhance security through the authorisation of drone detection radar. Echodyne appreciates the significant work undertaken by Ofcom in developing a framework for these emerging technologies and stands ready to support the effective deployment of drone detection radar capabilities throughout the United Kingdom.