



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.

No comment on impacts on the wider impact assessment (equality and Welsh language).

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?

Reference the 450MHz band only.

The FCS notes that Figure 4.2 in the consultation strongly supports the view that close coordination will be required in the 450MHz band.

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.

Drones pose a bigger coordination challenge. They operate at higher altitudes and so pose a bigger coordination problem. This impact will have to be included in the detailed calculation and spectrum arrangements.

The FCS notes that the higher altitudes may, depending on where in the band they transmit, affect the UK more than abroad, as they will be acting like high sites in European base station TX legs, which would be the mobile TX leg for the UK.

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.

The FCS notes the need to study actual assignments where appropriate in order to assess the suitability of the technical conditions. It is expected that the height vector will have a significant effect on the calculations for the licence.

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.

No

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.

No.

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.

No.

Question 8: Have you identified any other frequency bands we should consider for drone control links in the longer term?

No.

Question 9: Do you have any comments related to the existing satellite frequencies available for drone control links?

No.

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?

No.

Question 11: Do you have any interest in ground based UAT to complement the aerial component in 978 MHz licences?

No.

Question 12: Are you interested in or do you have any plans to trial the use of ISAC for drone detection purposes?

No.

Question 13: Do you have any other comments on this consultation document?

No.