

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? – No No comment
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? – No Given the limitations of spectrum currently available for Command and Control (C2) connectivity, we support Ofcom's assessment that additional spectrum is required within the 450MHz band and at frequencies below the existing 5GHz Wi-Fi allocations to improve coverage, resilience and payload bandwidth capacity.
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 Ofcom's proposal to accommodate C2 links within business radio spectrum and to adopt a mid-band assignment approach with appropriate guard-bands to mitigate the risk of harmful interference to adjacent services. Emergency and public safety services operating in the adjacent 450MHz band include 25kHz Tetra systems. We consider it important that any spectrum access framework continues to be supported by appropriate co-existence analysis and would engage further should additional modelling or impact assessment be required.
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,	Confidential? – N We support Ofcom's proposal to adopt an area defined regime and consider the proposed technical parameters, including a maximum operational height of 100m agl, to be proportionate and appropriate for achieving efficient spectrum utilisation while maintaining adequate protection for other spectrum users.

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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.	
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
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 We agree with Ofcom’s finding that speed meter maintained its measurement accuracy throughout the Drone Detection Radar (DDR) measurement scenarios conducted at the Baldock test site. The evidence therefore supports the conclusion that DDR systems can operate in this band without causing material degradation to speed meter performance and supports the proposed licensing of DDR systems in the band.
Question 7: Do you have comments on our proposal to create a new drone detection radar licence for the 16 GHz	Confidential? – N No comment

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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.	
Question 8: Have you identified any other frequency bands we should consider for drone control links in the longer term?	Confidential? – N No comment
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 No comment
Question 11: Do you have any interest in ground based UAT to complement the aerial component in 978 MHz licences?	Confidential? – Y No comment
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 comment
Question 13: Do you have any other comments on this consultation document?	Confidential? – N No