

Dear colleagues at Ofcom,

Whilst I understand the pressure to reduce costs at your organisation, I would like to make some points with regard to your new proposals to pass costs of licensing to satellite builders:

- 1) Costs of academic projects - Many University CubeSat projects have a budget of under 50KEuros, so finding an extra £10K for licensing is not trivial. Most Universities would struggle to find this sum for licencing at any stage of their project. More information on typical international University budgets on CubeSats (including quite a few well-funded US programmes) is here:  
<https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=3417&context=smallsat>
- 2) Timing of finding funding for licensing – this is highly variable and many groups will be gathering funding as they go. Only groups funded by a large grant will be paying for a launch so it is challenging to build this in to any launch budget. Many groups will not be paying for a launch at all. They will either piggybacking through the US University free schemes [ELaNa](#) etc. or going via the [ESA Fly your Satellite](#) programme. There is also the UK Space Agency [IOD scheme](#) which launches payloads. There are very few CubeSat launches coming from UK Universities currently and it is partly to do with the lack of free launches (which are a given in the US) and partly to do with UK insurance regulations.
- 3) Who to engage with – I would encourage you to engage with the UK Space Agency, the [European Space Agency Education team](#) , the [Space Universities Network](#) (a mainly learning and skills based academic organisation of which I am chair) and the [Space Action Network](#) (a mainly research-based academic organisation)

I know that at least the Universities of Bristol (where I am), Leicester, Cranfield, Manchester and Warwick, and probably many others, will be very concerned to hear that OFCOM are planning to add £10K or more to the cost of launching CubeSats, as this will be yet another hurdle for us to launch our satellites. Please can I encourage you to reconsider your position and include a waiver of fees for purely University-based projects in your policy?