Your response

Question	Your response
Question 1: Do you agree with the proposal to license drone equipment rather than to licence exempt? If you disagree, please provide the evidence that would support any disagreement with the proposals.	Y
Question 2: Do you agree with the on the proposed authorisation approach for UAS? If you disagree, please provide the evidence that would support any disagreement with the proposals.	Y for domestic only operation within UK territorial seas. However once UAS are operating outside of this limit they effectively become international and then under the Convention on International Civil Aviation each UAS will have to carry an appropriate radio station licence
Question 3: Do you have any comments on the proposed licence conditions?	Y provided that any licence issued makes it clear that additional approvals may be required for the CAA and that the licence is for use of the spectrum from a radio regulatory perspective only. With that in mind the CAA would suggest that work is done to ensure that requirements for permissions or licensing from the CAA are highlighted in the table in schedule 2 of the proposed licence, this would ensure clarity on what additional regulations apply and what aeronautical permissions/licenses are applicable. The CAA agrees with the concept of the licensing approach and the specific licensing of operators. However, OFCOM (and the CAA) must make it clear to operators that this OFCOM license in isolation won't permit use of the radio spectrum without an associated aeronautical radio licence (e.g. FRTOL or similar) if applicable, approved/certified items of CNS equipment on the RPAS and, where relevant, approval from providers of the services (e.g. 4G/5G and SATCOM providers).

Question 4: Do you have any comments on the proposed list of equipment and associated conditions?	Y provided that the equipment has to operate, where appropriate, with international aviation standards and where equipment operates in frequency bands outside of those allocated to aeronautical services then they meet the required technical performance required within the airspace it is capable of operating. The CAA would note that the frequency band 5091-5150 MHz is used by the MoD for telemetry The CAA would also note that where the Ka & Ku frequency bands are used by ESIMs then they cannot be used for safety related systems such as C2 but could be used for payload data.
Question 5: Do you agree with Ofcom's assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.	Y but close co-ordination with the CAA will be required to ensure that the two regulatory regimes work in harmony rather raise false expectations within the industry.

General Comment:

The CAA welcomes the proactive steps Ofcom are taking to develop the UAS licensing framework and the philosophy of broadly replicating the approach of existing manned aviation licensing via a combination of aircraft and pilot certification/licensing.

OFCOM have identified that future RPAS use cases will likely need to access the 4G/5G network, and that a suitable licensing framework is part of the critical path to enabling use of such technology. The CAA is investigating the complexities of mobile network authorisation for RPAS use cases and the aeronautical standards that would be required, this work is currently at an early stage but demonstrates that the licensing framework is a part of the key to unlocking the potential for use along with additional work to assess suitability. As this work evolves we will be engaging with key stakeholders to support its development.

Regarding aircraft equipment, Ofcom have identified the 1880-1920 MHz and 5030-5091 MHz bands as potentially being of future use for RPAS C2 Links. The CAA support this but appreciate the bands are out of scope of the current consultation. The CAA looks forward to collaborating with Ofcom to develop these areas and support the potential exploration of these bands.

The CAA has been working with EGIS to establish the preferred option for additional EC capacity. This includes the use of 978MHz to provide additional ADS-B capacity. This work also explores the interoperability with existing EC devices. The use of 978MHz has been identified as a desirable option and the CAA will be working over the next few months to establish next steps should this option be progressed. The impact of this work on requirements and standards (such as CAP1391) will be developed as this work is progressed.

The CAA support the proposal to prohibit use of equipment in the 2.5-2.69 GHz band to protect existing ATC primary radars from interference.