

Your response

Question	Your response
<p>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.</p>	<p>Confidential? – No</p> <p>Yes, we agree with the proposal to licence the necessary drone equipment rather than to grant a licence exemption for use with mobile networks. As Ofcom explains, with drones connecting to mobile networks, there are clear risks of interference to other services and users. As such, licence exemptions are not appropriate.</p>
<p>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.</p>	<p>Confidential? – No</p> <p>We agree that operators must have prior written approval from a network operator (MNO) before use.</p> <p>As Ofcom explains, the use of airborne mobile terminals can cause interference or impact the technical quality of the mobile network as well as some other users. Ofcom refers to 3GPP analysis showing that as long as no more than 33% of UEs in a cell are aerial, the effect on the mobile network is manageable with no additional measures required. However, we believe that even one aerial UE has the potential to cause interference.</p> <p>There is also an issue around legal liability were a drone using a mobile network to cause damage to something or someone. The liability in such a scenario would need to be contractually agreed between the prospective operator and MNO.</p> <p>It is therefore essential that Ofcom maintains its proposal for operators to require prior written approval from a network operator (MNO).</p> <p>Ofcom notes that if future technological changes mitigated the interference issue, it may look to remove the requirement for operators to get prior written approval from a</p>

	<p>network operator (MNO). Due to the issue of legal liability, we would urge Ofcom to maintain the requirement for prior written approval even if any interference issues could be remedied. However, if Ofcom were minded to remove this requirement in future, we would urge Ofcom to Consult again.</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>Confidential? – No</p> <p>In the event that an MNO initially allows an operator to use its network but subsequently wishes to withdraw its consent (for any reason), we would ask Ofcom to clarify in the final licence conditions or Statement that an operator’s licence is only valid while such written permission from an MNO remains in place.</p>
<p>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</p>	<p>No comments</p>
<p>Question 5: Do you agree with Ofcom’s assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.</p>	<p>No comments</p>