

## MOD Summary Response to Ofcom's Consultation on Innovation Licences

The MOD's Statement on UK Defence Spectrum Management made reference to Ofcom's consultation on innovative uses of spectrum. It highlighted the opportunity that respondents to the MOD's consultation on its implementation plan for spectrum reform believe is presented by pioneer licences, that could allow trials and test-bed services to be extended to develop commercial systems.

The MOD considers that licensing commercial use of Public sector spectrum (including that identified for military use) that, as yet, is neither liberalised nor non-tradable has some merit. However this is predicated by Ofcom demonstrating that it can be implemented in a way that will support Government's comprehensive strategy for the management of radio spectrum, the genesis for which was the Independent Audit (2005), and importantly clarifying that there will be no undue resource impact on the Public sector. Additionally, if Ofcom introduces innovation licences as an interim measure to allow organisations to launch commercial services more rapidly than would otherwise be possible, this may have an impact on the MOD's ability to exploit spectrum, but may also afford users an opportunity to access bands on a commercial basis earlier than the MOD's plans for releasing and sharing spectrum.

Since the MOD already shares a very significant proportion of the bands it uses with public and commercial users, Ofcom should demonstrate that the use of shared bands for national security, public safety and the emergency services, transport and science services will not be placed at risk by Ofcom's proposal to create a new innovation licence class.

The MOD considers that Ofcom should adopt a phased approach to the introduction of innovation licences that is consistent with and complimentary to plans that are already well advanced for Recognised Spectrum Access (RSA) for Crown bodies and the MOD's plan for acquiring, releasing and sharing spectrum in the market.