

Your response

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<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>Yes I believe that there should be an approval for the overall airframe with a list of equipment that is approved to fit onto the airframe</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>No – Section 4.4 However, as set out in section 3, existing licence exempt equipment already used on UAS and in some aircraft will remain licence exempt. This would cover the use of the 2.4/5 GHz Wi-Fi systems as well as the EC devices using the 860 to 870 MHz band.</p> <p>The 2.4/5GHz the same device that could interfere with ATC RADAR and it will be unlicensed? So no control?</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>Yes I do agree that authorisation needs to be given. There are areas that I believe need further thought with communications equipment. Currently Air Traffic Radio systems are designed for talking to aircraft on the aerodrome and in the air out to around 40Nm depending on the DOC, rather than a UAS Operator on the ground anywhere between the aerodrome and >40Nm away. When a UAS operator needs to talk to ATC, they must be able to maintain a good standard of communications with ATC. Consideration needs to be given to risks of integration with ATC units and the standards must not be lowered just because this is UAS.</p>

<p>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</p>	<p>Yes</p> <p>Mobile Network User Terminal (UE)- I have two concerns about this. Technical safeguarding of ATC RADAR's, as I would assume that this equipment would be more powerful than a mobile handset, there should be limitations set where this can be used around aerodromes. My second concern is, remote operators of UAS. I believe this is not only a safety concern, I also think that this could be a national security concern when you could have someone anywhere in the world</p>
	<p>piloting a UAS over the UK using a 5G network. This could be used by terrorist organisations or other nations to attack the UK.</p> <p>VHF Communications- The UAS must be able to change frequencies remotely if the radio equipment is located on the UAS or the operator must be able to communicate with ATC from their location if the radio is ground based.</p> <p>ATC Transponder- I'm unsure why you would need a FRTOL? Transponders are normally used for aircraft identification SSR, ADS-B etc. This would require CAA approval (Mode S Address) and the operator should have the ability to change the squawk.</p> <p>Electronic Conspicuity Device (ECD) – This only seems to make other aircraft aware, what about ATC and what about aircraft who don't turn ADS-B on, such as Police Helicopters who sometimes turn ADS-B off so they can't be seen on Flight Radar 24</p> <p>Satellite Earth Station Communication – Is't this ESOMP? I am assuming that this would be used to rebroadcast something from the ground. Or transmit something directly from the UAS? The operator will need to follow the current Ofcom procedure in place for this.</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>Yes – This should be the same as any other aircraft.</p>