

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>Confidential? – N</p> <p>We agree with the License Drone Equipment approach. The market for UAS related products is not mature enough to define common standards across RF devices that could justify exemptions.</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? – N</p> <p>For typical Windracers operations, all BVLOS operations involve UAS that have a G-Registration. This means a per-aircraft definition of equipment and licensing is already required.</p> <p>It is expected that the vast majority of aircraft within Windracers operations (UK-based) will contain identical equipment lists, however it is possible that specific aircraft could be modified as new technologies emerge, and the rate of adoption across the in-service aircraft might not be unified (i.e. This could result in a mixed fleet equipment list as the change is rolled out).</p> <p>If the only licensing option that exists is at “fleet level”, this would prevent any scheduled update rollout, and would effectively place a barrier to innovation as a grounding of all aircraft (and by implication service) would be required until they comply with the new License equipment. We ask this is considered through a “Fleet Level Standard, with non-specified equipment list”, whereby the type of technology and RF limitations are defined, but not to constrain the actual implementation on a per aircraft basis.</p> <p>It is unclear from the proposal whether the equipment list would be done at a “device name / model / power” basis, or purely a frequency basis. If it is the later this would provide some room for innovation whilst maintaining compliance.</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p>Confidential? – N</p> <p>The process is sound, providing the renewal of license fee does not require human intervention to process, whereby delays in the process could cause a grounding of aircraft purely due to administrative delays.</p> <p>Automatic renewal of annual license with 30-day term invoice for the fee would be an acceptable approach (or direct debit).</p>

Question 4: Do you have any comments on the proposed list of equipment and associated conditions?

Confidential? – Y
[~~REDACTED~~]

Question 5: Do you agree with Ofcom's assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.

Confidential? – N

Yes, we believe this would streamline (to some extent) application to OFCOM for licensing.

Will this type of license cover extensive commercial services throughout the UK?