

## Your response

Question	Your response
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>Yes</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>No, the parties represented in this response believe that the omission of an authorisation mechanism and spectrum allocation for use of radar on UAS will delay development of BVLOS uses for UAS in the United Kingdom.</p> <p>We disagree with the assessment in 3.42 that future requirement for detect and avoid equipment are uncertain at this time.</p> <p>NPAS have conducted BVLOS research and development over the previous 18 months, it is our understanding that to satisfactorily detect uncooperative aircraft in a range of meteorological conditions and at a suitable range, radar is an essential component in a detect and avoid system.</p> <p>Modini are a specialist Unmanned Air Systems (UAS) trials and evaluation company, and as part of their work they incorporate, manage, trial and test all types of sensors operating across a multitude of frequencies. The advent of novel UAS detect and avoid solutions utilise radar operating in the K &amp; Ku bands, as it offers a complementary blend of size and fidelity for small drone applications. A few systems are currently available from the US, but significantly more systems are now becoming available from UK &amp; worldwide suppliers. By not including this application (specifically the K/ Ku band systems for UAS operations) as a viable option within the UK spectrum, we have a high probability of falling behind the technology advances which have the ability to unlock airspace for several beneficial platforms which are soon to be entering the market.</p>

	<p>Manufacturers such as Honeywell have technology at a readiness level of at least TRL-6 and ready for trials and testing in the UK- <a href="#">Honeywell IntuVue RDR-84K Band Radar System</a>.</p> <p>The lack of suitable spectrum allocation for the use of such hardware in the UK means the manufacturers are unable to refine their hardware for use within any identified allocated spectrum. This is hampering progress of refinement of detect and avoid systems for the UK market.</p> <p>We believe the omission of radar equipment in the consultation and spectrum allocation for the hardware will restrict the development of BVLOS operations in the UK compared to progress which continues in the USA.</p>
<p><b>Question 3: Do you have any comments on the proposed licence conditions?</b></p>	<p>Confidential? – N</p> <p>No Comment</p>
<p><b>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</b></p>	<p>Confidential? – N</p> <p>No Comment</p>
<p><b>Question 5: Do you agree with Ofcom’s assessment on whether to introduce UAS operator licences? If you disagree, please provide further information.</b></p>	<p>Confidential? – N</p> <p>No Comment</p>