

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><i>Confidential? – Y / N</i></p> <p>Agree. Skyports is pleased that OfCom appreciates the need for having a specialised regulatory regime to enable and accommodate the technological development in the drone industry. With the implementation of licensing regime, we believe it could give a better oversight picture of the current use of mobile and satellite technologies for the regulators to keep track on records of usage and occurrence data and enable UAS operators, within the licensing framework, to gather safety data and evidence in support of their risk assessment and operating safety case. It will also make things more transparent for the mobile networks operators (MNO) as well as they will be able to gather more usage data and have a better understanding on their network users who are using their network legally or illegally.</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><i>Confidential? – Y / N</i></p> <p>Agreed with further suggestion on the authorisation process.</p> <p>Under the proposed authorisation approach for UAS operations, mobile networks operators (MNOs) would be empowered to determine whether the UAS operations could be conducted. In this regard, OfCom should issue a clear guidance for MNOs to ensure UAS operator’s requests will be handled in a timely manner. Application process should be as simple as possible, and a reasonable degree of automation on the application process should be considered.</p> <p>Under the proposed approach, certain BVLOS UAS operation would depend on MNOs’s decision, clarification will be needed for how OfCom would ensure that there will be no further additional administrative charge involved in obtaining the written agreement</p>

	<p>from the MNOs and what guidance the OfCom would issue for the MNOs.</p> <p>A centralised hub of information about the MNOs's contacts and each MNO's requirements for obtaining written agreement should be made available online and reviewed by Ofcom regularly to facilitate the authorisation process. By doing so, the UAS operator could identify the responsible and up-to-date contact of the MNOs easily and obtain the proposed permission from them accordingly.</p>
<p>Question 3: Do you have any comments on the proposed licence conditions?</p>	<p><i>Confidential? – Y/ N</i></p> <p>The conditions have to be realistic and verifiable for the UAS operator to follow. They should also be as straightforward as possible.</p>
<p>Question 4: Do you have any comments on the proposed list of equipment and associated conditions?</p>	<p><i>Confidential? – Y/ N</i></p> <p>As the Licensee must adhere to any terms and conditions imposed on it by the network operator(s), OfCom should provide more guidance or template on these terms and conditions. It might not be possible for the UAS operator to follow different set of operating conditions required by the network operators, while the UA with mobile network user terminal (UE) switches to a different network operator. The terms and conditions should be easy for UAS operator to follow.</p> <p>Any terms or conditions of the written agreement imposed by the MNOs should not prohibit the UAS operators from using the existing standard/ basic service. Terms or conditions should also not mandate the UAS operator to use certain specific product/plan/ hardware/or any drone specific service offered by the MNOs.</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><i>Confidential? – Y/ N</i></p> <p>There should be flexibility on the UAS operator licences regime that exception/ exemption mechanism should be in place in case there is</p>

alternative means of compliance available when the technology advances.

OfCom's assessment and justification on excluding the use of the 2.6 GHz band for aerial UE use are questionable, based on potential for interference and impact it would have on the technical quality of service. Skyports is of the view that any assessment should be performance-based and evidence-based, and the risk associated with the operations of the licenser holder, which will be dependent on various factors, such as: -

- i) Operating parameter (i.e., flight altitude)
- ii) Areas of operation (i.e., the distance between the UAS and location of 2.6GHz equipped ATC radar masts)
- iii) Impact of terrain (i.e., existing frequency coverage at very low altitude).