Consultation response form

Please complete this form in full and return to innovationreview@ofcom.org.uk.

Consultation title	Call for Input: Strengthening the UK's radio spectrum regulatory framework for innovation
Full name	Martha Suarez
Contact phone number	+57 3175179455
Representing (delete as appropriate)	Organisation
Organisation name	Dynamic Spectrum Alliance, DSA
Email address	Martha.Suarez@dynamicspectrumalliance.org

Confidentiality

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For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question	Your response
Introduction	The Dynamic Spectrum Alliance (DSA) welcomes Ofcom's Call for Input on strengthening the UK's radio spectrum regulatory framework for innovation. The DSA is a global cross-industry organisation dedicated to increasing the efficient utilisation of radio spectrum through dynamic spectrum access, spectrum sharing and modern spectrum management techniques. Our members develop technologies and services across a wide range of wireless sectors, including Wi-Fi, mobile, satellite, fixed wireless access, cloud infrastructure, enterprise networking and database-assisted spectrum management. The DSA strongly supports Ofcom's objective of ensuring that the UK's spectrum framework remains flexible, proportionate and capable of supporting innovation while continuing to protect incumbent services. As demand for wireless connectivity continues to increase, dynamic spectrum access, automated coordination and flexible authorisation mechanisms will become increasingly important tools for enabling innovation while ensuring efficient spectrum utilisation.
Question 1: Do you think we should permit more commercial trial activity under the Demonstration and Trial licence (including with paying customers) and whether we should impose any limitations on this?	Confidential? – N Yes. The DSA supports allowing appropriately managed commercial trial activity, including trials involving paying customers, where this enables technologies and services to be evaluated under realistic operating conditions. Such trials often represent an essential stage between laboratory testing and commercial deployment and can significantly accelerate innovation while providing valuable operational experience. Any such authorisations should remain proportionate to the potential interference risk and should not create an expectation of permanent spectrum access or preferential spectrum rights. Temporary authorisations should complement, rather than prejudice, future national or internationally harmonised spectrum decisions. Appropriate safeguards should also enable Ofcom to modify or withdraw authorisations where harmful interference cannot be adequately addressed.

Question	Your response
Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?	Confidential? – N The DSA encourages Ofcom to establish a clearer and more predictable pathway between research, trialling and commercial deployment. In many cases, innovative wireless technologies are technically mature but are awaiting completion of international regulatory or standards processes before wider commercial deployment becomes possible. Where appropriate, Ofcom should consider transitional authorisations that enable limited commercial deployment under defined technical conditions and for a specified period. Such arrangements could allow innovative services to reach the market earlier without prejudging longer-term spectrum policy or creating expectations of permanent access. Greater transparency regarding assessment criteria, technical evidence requirements and indicative regulatory timelines would also improve certainty for innovators and investors.
Question 3: Do you think it would be beneficial to enable some longer-term licensing options for Innovation and Trial licences?	Confidential? – N Yes. The DSA supports the introduction of longer-duration and renewable Innovation and Trial licences where there is an ongoing research, development or testing requirement. Many organisations undertake long-term research programmes that would benefit from greater regulatory certainty while reducing unnecessary administrative burden. Longer licence durations, together with streamlined renewal processes where technical parameters and interference environments remain materially unchanged, would improve research continuity and enable Ofcom to focus its resources on genuinely new applications. Such licences should nevertheless remain clearly distinct from permanent commercial spectrum rights.
Question 4: Do you think it would be beneficial to enable faster processing of low power Innovation and Trial licence applications, based on lighter-touch assessment? Are there any particular frequency bands or locations Ofcom should look to prioritise?	Confidential? – N The DSA strongly supports a proportionate, risk-based approach for applications presenting a low probability of harmful interference. Where predefined technical criteria demonstrate that the proposed deployment presents limited interference risk, applications should benefit from streamlined assessment and accelerated

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	approval. Rather than prioritising individual frequency bands or technologies, the DSA encourages Ofcom to establish objective technical criteria that can be applied consistently across different spectrum bands. Such an approach would remain technology neutral while encouraging innovation wherever the interference environment permits.
Question 5: Do you have any other suggestions for improving Ofcom's current approach to Innovation and Trial licensing?	Confidential? – N The DSA encourages Ofcom to continue modernising its licensing framework through greater automation and digitisation. Fully digital application processes, application tracking, automated interference assessment and standardised technical templates could significantly reduce administrative burden for both applicants and the regulator. The DSA also encourages Ofcom to consider establishing regulatory sandboxes or innovation zones where a wider range of wireless technologies can be evaluated under predefined technical conditions. Where technically appropriate, database-assisted coordination and automated authorisation processes could further reduce the time required to access spectrum while maintaining appropriate protection for incumbent users.
Question 6: Are there new ap-proaches to managing coexistence for bespoke spectrum licensing requests that we should implement to speed up the process?	Confidential? – N Yes. The DSA strongly supports greater use of modern spectrum sharing techniques when assessing bespoke licensing requests. Advances in automated coordination, database-assisted spectrum management and dynamic spectrum access now provide opportunities to enable more intensive and efficient spectrum use while continuing to protect incumbent and prioritised users. Where technically appropriate, Ofcom should consider greater use of mechanisms such as Automated Frequency Coordination (AFC), geographic and temporal sharing, dynamic power management and other automated coordination techniques. These approaches can significantly reduce licensing times, improve regulatory scalability and reduce administrative burden compared with traditional case-by-case coordination.

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Question 7: Do you think that there should be a greater expectation for applicants to provide the coexistence analysis to support their bespoke spectrum requests?	Confidential? – N The DSA agrees that applicants should provide appropriate technical evidence to support bespoke spectrum requests where proposed deployments have the potential to affect incumbent services. However, the level of analysis requested should remain proportionate to the scale of deployment and the associated interference risk. To promote consistency and reduce unnecessary effort, Ofcom should publish clear guidance regarding acceptable methodologies, modelling assumptions and protection criteria. While applicants should provide appropriate technical evidence, responsibility for assessing that evidence and determining whether appropriate protection has been demonstrated should remain with Ofcom.
Question 8: What do you think is the minimum security of tenure needed to support innovative uses?	Confidential? – N There is unlikely to be a single licence duration that is appropriate for every innovative deployment. The appropriate duration should reflect the maturity of the technology, the level of investment required and the characteristics of the proposed deployment. Where significant investment is necessary, multi-year authorisations may be appropriate. However, security of tenure should remain balanced against the need to preserve regulatory flexibility as technologies, market requirements and international spectrum decisions continue to evolve. Innovation licences should therefore not create de facto permanent spectrum rights or expectations of automatic renewal.
Question 9: Should we consider extending the Local Access licensing regime to other bands and technologies?	Confidential? – N The DSA supports exploring opportunities to extend flexible spectrum access where appropriate. However, the existing Local Access licensing model should be regarded as one of several regulatory tools available to support efficient spectrum sharing rather than as a universal solution. The most appropriate authorisation framework should reflect the technical characteristics of each frequency

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	band, the nature of incumbent use and the relevant sharing environment. Depending upon the circumstances, alternative approaches including automated coordination, dynamic spectrum access, general authorisation or licence exemption may provide more scalable and efficient solutions than individual Local Access licences. The DSA therefore encourages Ofcom to maintain flexibility by considering a range of authorisation mechanisms rather than relying on a single regulatory model.
Question 10: What do you think should be Ofcom's focus in updating how we licence spectrum to support wireless innovation? Do you have any other comments or views on the issues discussed?	Confidential? – N The DSA believes Ofcom should continue developing a modern, technology-neutral spectrum framework that enables innovative wireless technologies to progress efficiently from research and development through to commercial deployment. Priority should be given to proportionate regulation, streamlined licensing processes, automated coordination and flexible authorisation mechanisms that encourage innovation while ensuring efficient spectrum use. Future spectrum frameworks should recognise that modern connectivity increasingly relies upon complementary wireless technologies operating together. Dynamic spectrum sharing, database-assisted coordination and other innovative spectrum management techniques provide significant opportunities to increase spectrum utilisation while maintaining appropriate protection for incumbent users. At the same time, innovation authorisations should complement rather than replace established spectrum management processes. Temporary or bespoke authorisations should not create expectations of permanent spectrum access or prejudice future national or internationally harmonised spectrum decisions.
Question 11: Are there any other significant non-spectrum barriers to innovation for wireless services that you encounter?	Confidential? – N The DSA recognises that access to spectrum is only one element of successful wireless innovation. Delays in international harmonisation, equipment standardisation, regulatory alignment and technical rule development can all affect the timely introduction of innovative wireless

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	technologies. The United Kingdom is well positioned to address many of these challenges through continued leadership within international regulatory and standards organisations, including the ITU, CEPT and ETSI. By combining internationally harmonised spectrum policies with flexible national innovation licensing frameworks, Ofcom can help ensure that the UK remains an attractive environment for developing, testing and deploying next-generation wireless technologies.
Conclusion	The DSA welcomes Ofcom's initiative to review the UK's innovation licensing framework and supports the continued evolution of a regulatory environment that enables more agile, efficient and technology-neutral access to spectrum. Modern spectrum management techniques, including dynamic spectrum access, automated coordination and flexible authorisation mechanisms, can play an increasingly important role in supporting innovation while ensuring appropriate protection for incumbent users and promoting more intensive and efficient use of the radio spectrum. The DSA looks forward to continuing to engage with Ofcom as it develops the next phase of its spectrum innovation framework.

Please tell us how you came across this consultation.

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- [ ] Saw it on social media
- [ ] Found it on Ofcom's website
- [ ] Found it on another website
- [ ] Heard about it on TV or radio
- [ ] Read about it in a newspaper or magazine
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