

Question 1: Do you have any comment in relation to the authorisation of MCA systems on the basis of a common European approach?:

I support a common European approach

Question 2: Do you agree that the ECC Decision and associated technical requirements and limits will adequately protect terrestrial networks?:

I think the approach is overly protective and is likely to lead to unnecessarily higher costs.

Question 3: Do you agree that the initial authorisation regime of equipment for MCA should be via licensing rather than licence-exemption?:

Yes

Question 4: Do you agree that the aircraft operator should be the licensee of the radio equipment used for MCA on board?:

Yes

Question 5: Do you agree that the authorisation of radio equipment for MCA in the 1800 MHz spectrum band should be granted via a NoV to the existing aircraft licence?:

No. There should be a wholly separate licensing regime with aircraft safety as its sole objective.

Question 6: Do you agree that under the current licensing framework no additional fee should be payable for MCA spectrum authorisation?:

No.

Question 7: In your opinion, do you think that MCA services would fall within the scope of the EC Regulation on roaming? Please explain why you think that MCA services would or would not fall within the scope of this regulation?:

Yes. Mobile phone operators have already shown their willingness to grossly overcharge for the service they provide. Tighter regulation is clearly needed. This is unlikely to happen if another layer of regulation is introduced which would increase the scope for abuse.

Comments:

Notwithstanding the comments above I am not in favour of allowing the use of mobile phones on aircraft. The flying experience is already a very poor one - by far the worst form of public transport. To add widespread mobile phone use, particularly on longer distance routes (over 1 hour) would significantly worsen the experience. Ofcom should revisit the original decision with a view to reversing it.