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Dear Sir,

I have been passed a copy of your "Independent Review of Spectrum Management' and would like to comment on the summary below.

'FOR SPECTRUM RESERVED FOR ON-BOARD NAVIGATION AND COMMUNICATIONS SYSTEMS, THE OPPORTUNITY COST TO INDIVIDUALS USERS IS, IN MOST CASES, EFFECTIVELY ZERO, SINCE USE OF THIS SPECTRUM IS MANDATED INTERNATIONALLY, AND USERS ARE REQUIRED TO ADOPT SPECIFIC TECHNOLOGIES. BUT WHERE UK BASED USERS FACE SOME TECHNOLOGY CHOICE FOR THEIR ON-BOARD SYSTEMS, THEN THE RA, WORKING WITH THE CAA AND THE MCA, SHOULD APPLY DIFFERENTIAL LICENCE FEES TO ENCOURAGE MOVES TO MORE SPECTRALLY EFFICIENT EQUIPMENT, THUS EASING CONGESTION OVER TIME.'

I cannot see how you can say that the cost to users is effectively zero. The use of Radios and Transponders is mandated by the CAA for certain parts of our airspace and thus we are forced to use this equipment if we want to fly in this airspace. If the CAA were to provide free radios including installation, maintenance, upkeep and licences then this could be said to be zero cost, but unfortunately they do not. The cost of purchasing radio equipment is significant, not helped by the requirement to buy an annual license which appears to be nothing more than a tax. All of this cost is particularly annoying, when I can fly most places I want to without a radio, but have to have a radio in order to cross controlled airspace which is on my route. In most cases the reason for needing radio contact is for the benefit of commercial or military operators using this controlled airspace and of no benefit to myself.

We have already seen the requirement and cost of fitting 760 channel radios, only necessary because of increasing commercial traffic and now 8.33Khz spacing is introduced, thankfully only for upper airspace not used by most GA aircraft and thus we do not need these radios.

As the radio spectrum is mandated internationally, as long as we comply with this there should be no need for any change of equipment or any charge.

Infact precisely because of this international mandate, it should be obvious that Radio equipment certified in the USA or Australia etc meets these requirements and thus we should not need to waste more money having the CAA go through another duplicate certification exercise for each piece of equipment.

When I fly commercially I am flying in controlled airspace, relying on Air Traffic services talking to foreign aircraft with non CAA approved radios, thus I see absolutely no reason why these Radios should need additional CAA certification to be fitted to a GA aircraft. This is a waste of money for absolutely nothing.

I am just completing building my own aircraft under the PFA scheme, I am appalled that I now have to buy a radio licence, which effectively is just a tax on having the radio installed, which only need to be able to fly into airspace where the CAA has mandated that I need a radio. We are told that the RCA needs the money in order to protect our spectrum, but as stated in the summary, this is protected by international mandate and as it is of most benefit to the military and commercial operators it is them that should pay.

As happened with the dog licence some years ago, which was probably of more use than the radio licence. I believe the radio installation licence for aircraft should be scrapped (after all the installation is already technically approved during the aircraft C of A or PFA Permit)

As a second cost saving, the UK CAA should immediately recognise all FAA, Australian, JAR etc radio certification and stop all duplication in certification. The only time the CAA need certify a radio design is if this is a new UK design.

I completely object to yet more fees for the equipment that we have installed.

Best Regards

Nigel Hitchman
Aircraft owner, GA Pilot and Airline Pilot.

to: spectrum.review@ra.gsi.gov.uk or posted to: Laurence Green, Radiocommunications Agency, 11B/20C, Wyndham House, 189 Marsh Wall, London E14 9SX.