

Attn: Mr. Daniel Storey
Radiocommunications Agency
Wyndham House
189 Marsh Wall
London E14 9SX
United Kingdom

Dear Mr. Storey,

SUBJECT: RADIO SPECTRUM MANAGEMENT REVIEW CONSULTATION
PAPER

The Association of European Airlines (AEA), a trade organisation representing 29 major European airlines, would like to comment on the UK Consultation Paper "Radio Spectrum Management Review".

Air transport is an essential part of the infrastructure of all communities and this is particularly so in the United Kingdom. The airline industry and its complementary support activities provide considerable employment and are an indispensable utility for many areas of the society. The total economic impact of aviation on gross world output amounted to at least US \$1,140 billion (1994 figures). It is especially important to note that the airline industry is a key element of the tourism industry, the world's biggest industry both in terms of employment and turnover (annual gross output of roughly US\$ 3,600 billion, about 11% of the world's total GDP, 1996 figures).

To navigate aircraft in a safe and efficient manner, aviation must have sufficient, interference free, radio frequencies. Failure to protect frequency bands would put flight safety at risk and probably result in substantial costs for airlines and infrastructure providers. Due to its global nature, aviation needs globally allocated radio spectrum as a prerequisite for doing business.

Harmonisation of radio spectrum for aviation already occurs on a global basis. Any national attempt, such as the proposal in the UK Consultation Paper, would have a negative impact on global efficiency and be a disadvantage to globally operating airlines and their customers.

It is worth noting that air transport - unlike other transport modes - already pays for all its infrastructure costs both in the air as well as on the ground. This means, for example, that provision of the primary and secondary surveillance radar services are recovered from the airspace users via aeronautical charges. Additional UK charges for aeronautical spectrum will increase the airline's costs, potentially leading to higher ticket prices and economic recession. For this

reason aircraft radio licensing has traditionally been based on the administration costs incurred.

In summary, the AEA would be opposed to additional UK charges for aeronautical spectrum above the administration costs incurred. Moreover, if additional charges must be made, all users should be treated equally, on a global basis, in line with international agreements and Treaties.

A signed copy, dated 17th August, has been mailed to you via normal post.

Yours sincerely,

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Manager Operations and ATM

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