

For the attention of Daniel Storey.

Response to the Independent Radio Spectrum Management Review from the British Airline Pilots Association

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- > The British Airline Pilots Association (BALPA) represent over 8,000
- > members, UK professional flight deck crew who rely on the integrity of the
- > safety of the airspace environment. We understand that the purpose of
- > this review is to identify where the Government can extend further charges
- > by imposing the requirement for a more market based approach and we
- > question how any responsible Government could consider the sale of
- > aviation frequencies on which the safety of the entire aviation industry
- > depends. We note that the paper accepts that there may be no immediate
- > alternative spectrum - efficient means to provide the same safety
- > standards, but we would point out that this is unlikely to change in the
- > future even taking into account technological advances. At the present
- > time the industry is experiencing a reduction in ILS (Instrument Landing
- > Systems) frequency protection and VOR frequency protection (VHF omni
- > directional range navigational beacons), radar coverage to provide for the
- > safety of all commercial flights in the UK is still not provided. The
- > aviation industry is expanding, not contracting, the air traffic control
- > sectors are at saturation point, in order to cope with existing demands
- > the UK will be introducing reduced bandwidth spacing in the upper airspace
- > to provide increased frequency availability (at a cost of reduced clarity)
- > to increase the numbers of frequencies and therefore available sectors,
- > available for air traffic control.
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- > The UK should not consider a reduction in standards from those required by
- > the International Civil Aviation Organisation, to whom the UK is a
- > signatory. UK based secondary radar does require full international
- > harmonisation of interoperable equipment on board aircraft. Aircraft
- > transponders relate to secondary radar and become critical with the
- > worldwide development and use of mode 'S'. Primary radar is different in
- > that it does not relate to aircraft equipment, but radar manufacturers in
- > the UK would find commercial difficulty in developing different standards
- > for different domestic markets.
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- > The paper questions whether this is a valid description of the factors
- > affecting the use of the radio spectrum by aeronautical services. We do
- > not think it addresses the issues fully.
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- > Individual company VHF frequencies could be encouraged to change to
- > terrestrial flight telephone systems to release their frequencies in the
- > aeronautical band. These are often much underutilised as R/T channels.
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- > Realistically we would suggest that if there were additional charges that
- > these would have to be passed on through the navigational service charges.
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- > We would appreciate being kept advised of the outcome of the consultation
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- > Regards
- > Carolyn Evans
- > Technical Secretary