

British Air Transport Association

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Mr Daniel Storey
C/o Radiocommunications Agency
Wyndham House
189 Marsh Wall
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24 August 2001

Dear Mr Storey,

Radio Spectrum Management Review

I have pleasure in enclosing British Air Transport Association's response to the consultation paper issued by Professor Martin Cave on radio spectrum management.

Yours sincerely,

Roger Wiltshire
Secretary General

Radio Spectrum Management Review

Response by British Air Transport Association

Introduction

The British Air Transport Association (BATA) welcomes the opportunity to contribute to the government's radio spectrum management review and to comment on the consultation paper issued by Professor Martin Cave. BATA represents UK-registered airlines, both scheduled and charter. Our members produce 95% of UK airline output.

BATA fully supports the submission made by British Airways so that rather than repeat all the detail therein we confine our response to emphasising the following key points:

- A clear distinction needs to be made between the commercial and non-commercial use of the radio spectrum. Sufficient spectrum should be made available for safety critical applications, including aviation.
- Although aviation is a commercial activity, its use of the spectrum is almost entirely driven by the requirements of navigation, surveillance and safety. The carriage of radio and its operation is mandatory and is tightly regulated by international standards and agreements. Airlines therefore have little choice about the spectrum they use and this use cannot be treated as if it were part of the commercial spectrum.
- Aviation is an international business and its use of the radio spectrum must continue to be subject to international agreements. Any rationalisation of the equipment or use of the radio spectrum can only occur at the global level and cannot be carried out by an individual state.
- Charging for use of the aviation spectrum, including primary and secondary surveillance radar services, should be consistent with the ICAO guidelines on cost recovery. The charges must be applied equitably to all users and in a way that does not disadvantage UK-based airlines in relation to foreign competitors.

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