

# HELICOPTER CLUB OF GREAT BRITAIN



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17th August 2001

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Dear Mr. Storey

## **Radio Spectrum Management Review**

The Helicopter Club of Great Britain comments as follows on the Review.

### **Aeronautical and maritime Services**

- 1) The review is correct in stating that there is really no possibility, or need, of changing the internationally agreed radio frequency band allocated to civil aviation, as aircraft world-wide are equipped with radios especially for these frequencies.
- 2) These radio frequencies are used for air traffic and aeronautical safety, and are already constrained. It would be counter-productive to aviation safety to impose 'economic incentives' upon use of aeronautical radio communication. Both aircraft and airports already pay radio licence fees. It would be a detriment to aviation safety if air traffic controllers or pilots were to suffer a use based economic penalty for passing radio messages, and, bearing in mind that aeronautical frequencies are internationally protected, any charges levied would effectively be a tax. It is obvious that pilots would seek less safety information, and be less well informed of real time aviation situations if charges were use based, and that consequently safety would be decreased.
- 3) The majority of aircraft registered in the UK fly in uncontrolled airspace, and as they do not receive an air traffic service in such airspace, could not be charged on a use based system.
- 4) In summary, the VHF air traffic radio band is of a fixed, internationally agreed size, already considered by some to be too small. It is not available for any other use. Tens of thousands of aircraft world-wide are fitted with aviation quality radios that

only work on this band. International air traffic is a huge industry, and attempts by one country to unilaterally change such a long established system would be counter productive to aviation safety, particularly in the UK.

Yours sincerely,

J.F.H. James  
Secretary  
Helicopter Club of Great Britain