



International Air Transport Association

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August 14, 2001

REF: 402/5.07

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

Dear Mr Storey:

IATA, on behalf of its 275 international member airlines, appreciates the opportunity to comment on the consultation paper “ Radio Spectrum Management Review”.

For aviation to maintain its role as a catalyst for global and national economic growth it is important that it conduct its business safely and efficiently, therefore, it has to rely to a large extent on the States to sustain the required conditions. One important condition is to provide sufficient radio spectrum and protection against harmful interference.

Prior to addressing the specific aviation-related issues in the consultation paper, it is appropriate to comment on paragraphs 7, 11, and 16 since these have an important bearing on aviation’s interests.

a) The focus on maximising economic efficiency in spectrum use in all sectors of the UK economy (Reference paragraph 7 and 11)

Aviation has not increased its demand for spectrum since WARC 1972. The enormous expansion in global air travel during the last two decades has been fully accommodated within the appropriate allocated bands, through increased spectrum efficiency and tighter global harmonisation. Aviation anticipates that it can accommodate further growth within the presently allocated bandwidth provided the present access conditions do not dramatically change. However, aviation can not compete in spectrum access with emerging services looking for new business opportunities.

Of prime concern to aviation are the growing demands from mobile communication service providers competing for spectrum, to reduce interference protection margins. Fierce competition between providers to capture the potential market will lead to a trade off between costs and the sustained level of noise interference with the potential risk of degradation of the aviation service. This trend in reducing the safety margins

for safety of life services will force aviation to look for complementary systems operating in other frequency bands with consequential loss of overall spectrum efficiency, and increases in the cost of the supporting communication, navigation and surveillance infrastructure services. These “hidden” increased spectrum operating costs would be passed on to the consumer thereby increasing the cost of air travel/air freight, but with no associated benefit to the consumer.

A competition in spectrum access can only be fair between those industries selling communication and navigation services on a commercial basis. To the industries for which access to spectrum is not a business opportunity but a pre-requisite to provide other services to the public, it is essential that a balance be made between new market opportunities and general public interest. Within this balance, IATA would reject any compromise between safety of transportation and other market opportunities.

b) Economic impact of radio (Paragraph 16)

As other industries (including aviation) are becoming increasingly reliant on mobile communication and developments in the telecommunication industry, and if decisions on radio spectrum are based solely on the commercial exploitation of radio spectrum, their relative strength would diminish. This could have a dramatic effect on the profitability of these industries and its ability to be the catalyst for national economic prosperity.

The benefit/fee ratio approach might be a significant indicator to those industries selling services directly related to the spectrum access. For other services such as aviation, the value is purely based on the benefit to the consumer, since for the producer any increase in radio spectrum access costs increases the price to the customer. This hidden tax increases the overall costs for consumers of air transportation services.

From the aviation perspective, we herewith provide our comments to your issue for discussion related to Aeronautical Services.

Issues for discussion:

xxiv. Is this a valid description of the factors affecting use of radio spectrum by aeronautical and maritime services?

xxv. Given the international harmonisation constraints, where could new economic incentives most encourage more efficient use of spectrum in the UK?

xxvi. How far could changes in spectrum use charges be reflected in air traffic control fees, which are passed on to users of UK airspace and landing services?

Changes in the air transport infrastructure have to be carefully planned to ensure a safe and globally harmonised transition involving numerous states. To facilitate these changes, the International Civil Aviation Organization (ICAO), supported by member governments and their national Air Traffic Service providers, establish long-term plans at global, regional and national levels. To comply with these international agreements, aviation obtained access to specific radio bands to ensure an adequate infrastructure capacity to meet the growing challenges of air transport congestion.

Aviation needs no specific additional measures for the harmonisation of radio spectrum requirements since this is already managed on a world-wide basis through ICAO. Considering the efficiency achieved with this global harmonisation, any national attempt to increase the efficient use of spectrum on a purely national basis would adversely impact overall global frequency efficiency and reduce the affected national industry's ability to compete at global level. The cost of provision of air traffic services by the United Kingdom is already amongst the highest in Europe. The only new economic incentives, which could encourage the increased use of aviation spectrum, would be a reduction of the present air traffic management infrastructure costs to a comparative level with other, more cost effective pan-European service providers.

Furthermore, levying charges for those industries using the spectrum to conduct their business will increase service costs, which potentially could lead to inflation or reduced public spending and ultimately recession. For this reason aircraft radio licensing is traditionally based on the administration costs incurred.

In closing my comments, may I emphasise the need for aviation to have adequate spectrum allocated to conduct its business. Within this spectrum allocation aviation has always been given special protection against interference. This protection, is not a luxury but an integral part of aviation to ensure a safe mode of transport to the public, and a major engine of national and the global economies.

IATA on behalf of its members and the travelling public, trust that irrespective of the outcome of the consultation process, the safety aspect will be appropriately addressed.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'John F. White', with a large, stylized loop at the end.

John F. White,
Director, Infrastructure Support Group