



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

17th August 2001

Dear Mr Storey;

Iberia Airlines of Spain would like to take the opportunity to comment on the consultation paper "Radio Spectrum Management Review".

Navigation and communication equipment for aircraft has a very severe certification in order to avoid interference and to warranty reliability for a safe flight. In this sense, one of the concerns to aviation is the growing demand from mobile communication service providers competing for spectrum, to reduce interference protection margins and putting on risk flight safety.

On the other hand, air transport is undertaken on a global basis, consequently any changes in the radio spectrum use at national level will have an impact on global operation. All these issues would have to be evaluated very carefully as well as to take into account ICAO global plans.

In relation with the suggestion about new additional charges for spectrum use, any charges above the aeronautical costs already incurred by the air transport is going to have a negative impact on aviation. Firstly, the proposed charge apparently is not related with a new service and of course would not incentive a better use of aviation spectrum. Additionally this charge will increase airline costs that in any case would be transferred to the passenger who, at the end, would pay a higher ticket price.

In summary, Iberia would like to emphasise that aviation needs to have adequate spectrum allocated to air transport in order to conduct its business in a safe and efficient way and in this regards we would be opposed to any extra charges for aeronautical spectrum use.

Thank you for your understanding.

Sincerely yours,

Jorge Rivera
VP International Affairs