



Association of European Airlines

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Mr Geoff Chapman  
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04 October 2002

Dear Mr Chapman,

**SUBJECT: IMPLEMENTING SPECTRUM TRADING  
A CONSULTATION DOCUMENT (JULY 2002)**

The Association of European Airlines (AEA) is the trade organisation, representing the interests of Europe's major scheduled airlines.

First of all, we would like to thank you for the opportunity to comment on the UK Radiocommunications Agency Consultation Document (July 2002), which seeks views on how best to achieve spectrum trading in the UK.

To operate aircraft in a safe and efficient manner, aviation must have sufficient interference free radio-spectrum for communications, navigation and surveillance. Failure to adequately protect aviation radio frequency bands would put flight safety at risk and probably result in substantial costs to the airlines and infrastructure providers. Due to its global nature, aviation needs globally allocated spectrum as a prerequisite for doing business.

It is our belief that the allocation of radio spectrum for aviation use should continue to be agreed between governments at the international level - to ensure that safety is not compromised by external interference. These existing processes and regulations obviate the need for regional Required Spectrum Access in Aeronautical bands. Due to flight safety reasons and the need for global solutions, it takes long lead times before aviation is able to completely transition to new system solutions. In practice this also often leads to specific equipment mandates on aviation, with no alternatives.

With regard to the specific questions asked, we would like to comment on question 6:

Question 6 License classes from the following sectors are proposed for a second wave of spectrum trading: sound broadcasting (analogue and digital), television broadcasting (analogue and digital), programming and special events, and aeronautical and maritime. What is your view of these proposals?

AEA response to Question 6:

The AEA believes that the trading of aeronautical spectrum is not feasible in practice:

- Trading would be possible only if alternatives were available, which is not the case for aeronautical spectrum as explained in the general comments above. If aviation were forced to trade part of its spectrum it would have to give away an indispensable resource and thereby severely jeopardise its obligation and responsibility to provide safe air transport according to public demand.

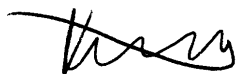
- Trading is only possible if a clear user/owner of the spectrum can be identified, which is not the case for aeronautical spectrum. Aeronautical spectrum is used to navigate aircraft safely based on a shared responsibility/usage between airlines, Air Traffic Service (ATS) providers, airports and national Civil Aviation Authorities (CAA) who all use the same spectrum.

- Harmonisation of aeronautical radio spectrum occurs on a global basis and in line with international agreements and Treaties. Unilateral action by individual parties or states, such as proposed in the Consultation Document, would have a negative impact on global efficiency and be seen as a threat to globally operating airlines and their customers.

Thank you for your understanding,

Kind regards

Yours sincerely,



Vincent De Vroey  
Manager Operations and ATM