

Title:

Dr

Forename:

Andrew

Surname:

Levison

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you consider that our proposed fee rates for licences in the aeronautical VHF frequencies are appropriate?:

No. The aviation frequency spectrum is already well regulated and very safely managed and introducing charges for this will be intolerable burden on an already financially overstretched sector.

Question 2: In devising our revised proposals, have we identified all of the aeronautical uses of VHF communications frequencies which require a distinct approach to fee setting, as set out in tables 5 and 6?:

No. They do not need regulation by OFCOM

Question 3: Do you agree with our proposal not to charge any fees for Fire assignments?:

Yes. You should not be charging for the use of any aviation frequencies

Question 4: Do you agree with our proposal to set a £75 fee for licences in any of the sporting frequencies?:

No. As stated above, you should not be charging for these frequencies in the first place

Question 5: Do you agree with our proposal to set an annual fee of £19,800 per ACARS or VDL assignment, with no variation related to the number of transmitters?:

No. Any charging is unnecessary and will be detrimental to aviation with potential safety implications as users have to cut back in other areas.

Question 6: Do you consider that our proposed approach to phasing in fees for use of the aeronautical VHF communications channels are appropriate? If there are particular reasons why you consider that any user or group of users would need longer phasing-in periods, please provide any supporting evidence for us to consider. Specifically, do you have any evidence for us to consider that would support either of Options 1 and 2 for the highest proposed fee in this sector?:

Absolutley not. These frequencies are already well regulated and managed by the CAA and introducing such charges is totally unnecessary and very detrimental to general and commercial aviation in this country.

This appears to be little more than an exercise to squeeze more money out of an already financially compromised sector with absolutley no benefit as a result.

Question 7: Do you have any further quantified information to contribute to the analysis of financial impacts of the proposed fees on particular spectrum users, as set out in Annex 5? We would like to publish all responses, but will respect the confidentiality of any material which is clearly marked as such.:

There is a huge potential for smaller users such as AG units at smaller airfields to be put out of business or stop using radios by such charges.

What may happen if they abandon the use of radios the airfield would not have any radio communications which would have huge potential safety implications.

Bigger airfields will have to pass on these charges to users which will potentially greatly harm their business as users will be put off visiting these airfields
Overall aviation safety could be greatly compromised by this significant and unnecessary financial burden.

Question 8: Do you consider that our assessment of the impacts of our proposals has taken full account of relevant factors? If you consider that there is additional evidence that would indicate particular impacts we should take into account, we would be grateful if you could provide this.:

Absolutley not. OFCOM tried this in 2008 and abbandoned it then due to overwhelming oppostion. Why is it trying it again?

It is purely and simply a way to try and raise money from aviation which is already on its knees financially with absolutley no benefit to the aviation sector.