

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name 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- Most small airfields have great difficulty meeting their overhead and operating costs. Ground to air communication is vital to the safety of aircraft in flight, landing and take-off and there is no option to manage without it.

These charges may well be the straw that breaks the camel's back and many small businesses will probably close as a result.

In this case, a few extra pounds for the treasury will be at the expense of the livelihood of some people and the safety of others.

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?:

This question implies that the regime of fee charging is a given and that all you are looking for is to make sure you have not missed anything.

Thus the consultation is disengenuous from the outset.

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

NO

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

Why £75 - It seems an arbitrary amount. What is the basis for this charge.?

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?:

Yes

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?:

The phasing seems appropriate.

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.:

NO

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.:

NO - As per my answer to Q1, I think there has been no genuine assessment of the effects of the charges on the operators of small and fledgling airfields.

Increasingly the development of the broadband networks is alleviating the pressure on the use of radio communication. For example, with the introduction of the BBC i-Player and equivalent ITV and Channel 4 systems, the day can be seen when viewers will no longer be dependent on terrestrial and Satellite RF transmission. The assumption that RF spectrum will always be over-subscribed may not be true when the large bandwidth occupied by TV services can be reduced.