

Title:

Forename:

Surname:

Withheld

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?:

Absolutely not. Aeronautical VHF frequencies are vital to flight safety and imposing fees will inevitably lead to reduction in services with a consequent increase in risk to pilots in the event of emergencies, and a concurrent risk to personnel under the flight path.

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 is a loaded question, as no frequencies require a distinct approach to fee setting, as fees should not be set for ANY aeronautical use of VHF communications.

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

Yes

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

No

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?:

Absolutely not

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?:

No they are not appropriate as they assume that phasing in of fees is a done deal. This is a consultation about applying spectrum pricing to the Aeronautical sector. If this is a true consultation and not just an act to assuage public opinion, then no discussion of the application and phasing in of fees is appropriate UNTIL such a time as the application of fees has been considered in the light of the consultation.

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.:

I am sure that individual airfields that are struggling to make ends meet have already submitted details of the severe financial impacts that these proposed charges would have if implemented.

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.:

Not at all. No consideration whatsoever has been given to the impact on flight safety, other than a passing remark that it is up to the CAA to determine safety. Legislation which will result in additional deaths and serious injuries is fundamentally flawed, and surely a breach of our human rights.