

Title:

Mr

Forename:

John

Surname:

Broad

Representing:

Organisation

Organisation (if applicable):

Vintage Aircraft Club

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.

Your proposal to gain income at the expense of safety is deplorable. Your suggestion

that safety is not of your concern is tantamount to irresponsible action and should not be stated by a major regulator of the UK.

Charging, other than a basic fee for the issue of a license, for a section of the frequencies you have no control over will not have the effect you require. The fees suggested are draconian to aerodrome operators in the UK and will cause these operators to give up their allocated frequency to the detriment of safety whilst producing no income to yourselves.

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?:

The question is irrelevant as setting fees, or more correctly, taxes, for aviation frequencies you do not have control over makes no sense. If the frequencies are given up by the current users you do not have the ability to re-allocate the frequency to others in the UK as the decision is made Europe wide. The frequency will more likely go to a European operator with a serious loss to the UK and a further reduction in safety in the UK.

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

Whilst agreeing, the theory that you recognise the requirements for Fire & Rescue as being for safety logic must be similar for the safe operation of aircraft in the UK. Your logic does not transfer across?!

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

No.

The current license fee is perfectly adequate for administrative purposes.

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.

No logic is provided as to why a "fee" of this magnitude is required for administering the assignments; or are you really setting a tax, in which case you should be open about it!

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!

You have to decide whether these are "fees", a sum payable for a service, or a tax - money paid to a government. I suggest what you are proposing is a tax and not a service as the fee for the service could be calculated in time required to provide that service whereas a tax is an indeterminate amount evolved to see how much can be squeezed from the users.

Phasing in only allows your "tax" to become larger over the period of time you suggest; after this it will increase as a tax year on year.

The first phase will create hardship for aerodrome operators who are already struggling causing them to give up their frequency allocation to the detriment of safety. You cannot pass this safety issue to another agency to make more rules to overcome the issue you will create. I reiterate that the charges are not "fees" but a "Tax" and are not appropriate to the safety of aviation in the UK.

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.:

Most aerodromes used by Vintage Aircraft Club members are small, often grass and are run close to the limits to keep operating. The swinging "Tax" (your "fee") proposed would cause these operators to either close down or give up their radio. Closing down is in direct contradiction with PPG13 Transport, especially if caused by your proposals. Giving up the radio would have nothing to do with the efficiency or otherwise of the radio frequency being used as you suggest being the reason for your proposed "tax".

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.

Aviation radio frequencies are allocated by international agreements and spaced according to the requirements to minimise interference. Any frequencies given up, not by any efficiency as you suggest, but by the impracticality of being able to pass on the cost of this "tax" to the users, would not be in your hands to re-allocate. The most likely result would be the loss of the frequency to the UK as it would be used by a European operator with the serious consequence that the UK would be even more unsafe.

The net result would be increased use of the "Safety com" frequency, which you have no control over, with the potential for confusion at adjacent aerodromes regarding traffic separation.