

**Title:**

Mr

**Forename:**

John

**Surname:**

Mangan

**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 - they compromise the recreational side of aviation as they do not take into account adequately the minimum cost basis that many of these organisations operate under. Radio communications support safety in a big way and safety holds no bounds nor should it have to be bought.

**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?:**

Too many

**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, because it sets the recreational flying levels disproportionately too high.

**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?:**

Table 5 indicates the value is a single fee and not (annually) repeatable. Which is 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?:**

This question implies acceptance of the concept, which I do not for the recreational end of the aviation sector. Therefore I do not consider "...the proposed approach to phasing ... " to be "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 but only because I don't have the time to do the research and analysis.

**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.:**

I'm afraid I don't. Unfortunately it appears to me that Ofcom has become wrapped up in the financial aspects of the Spectrum and its judgement has become coloured by maximising the potential gains and had given insufficient recognition of the wider aspects of the aviation spectrum usage. To argue (as Ofcom appears to do) that market forces should allow frequencies to go to the highest bidder, only serves to support this assertion, Furthermore, to force the recreational end of the market to have to pay heavily for the basic commodity of safety in the skies, will price much of the sport out of existence as they, unlike the airlines, cannot pass the cost on to the fare paying passenger.