

**Title:**

Mr

**Forename:**

John

**Surname:**

Ismay

**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 costs of operating a high quality, safe and approved aerodrome have increased substantially in the last few years. Aviation is regulated by the CAA to international standards, the costs of which are directly borne by the end-user, the pilot/aircraft operator. Some of these pilots/operators have already been forced to quit

due to escalating costs. Those remaining will continue to fly as long as they can afford to. This, in turn, has led to a reduction in revenue to aerodromes and eventually, if trends continue, will lead to the closure of those aerodromes. Aerodromes have no choice with regard to radio operation, under the W.T Act 2006 we have to operate within the law. OFCOM provide advice & guidance to the Government regarding use of the spectrum. Increasing the licence costs will reduce the number of ATC/FIS units (with the consequent reduction in safety) and achieve the purpose of this consultation in reducing congestion on aviation frequencies. Well Done. Mission Accomplished!

**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?:**

See answer to question 1.

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

No. This is an "appeal" to non-aviation parties in an effort to soften the perceived impact on safety.

The use of radio in aviation is to provide a "safe & efficient flow of air traffic". Significantly, distress frequencies tend to be used when no other agency is within range or available to the aircraft with the problem.

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

No. The number of "airprox" reports that are generated due to airspace infringements and losses of separation that cite the proper use of R/T would have prevented is significant. This has provoked an effective, ongoing campaign by the CAA and sports aviation organisations to use and monitor the correct frequencies in an effort to enhance safety. By reducing the number of ATC/FIS units (by economic failure) appears contrary to logic and experience.

**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?:**

**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. I believe that this effort to reduce frequency congestion is devious. If an aerodrome has met the necessary regulatory requirements to obtain Article 124

Approval (and all that goes with it) and operate on the frequency allocated the licence should be an administrative fee, not a bidding competition with Sky, Virgin, O2 etc.

**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.:**

Unfortunately, quantified information regarding the closure of ATC/FIS units will only be retrospective.

**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.:**