

**Title:**

**Forename:**

Withheld

**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, Totally inappropriate because frequencies cannot be allocated by Ofcom therefore not sold.

The CAA have also stated there is no unfulfilled demand for frequencies therefore they have no value.

You state you do not consider safety, you have to as it is every organisations responsibilities to consider safety when applying any change that could impact safety.

**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?:**

You should not be considering ANY uses reserved in the aeronautical spectrum for a fee based system as there is no demonstrable need to do so.

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

Of course, but you should also realise that Fire assignments will also use ATC frequencies to communicate with ATC, therefore no ATC frequencies should be charged either.

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

No, you supply nothing of value whatsoever so the charge is therefore a tax which you are not able to raise.

**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

**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?:**

Phasing in fees is only appropriate if you can clearly demonstrate an need and benefit for the fee in the first place, this you cannot do.

**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.:**

It is flawed, no need is demonstrated in the first place.

**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.:**

You have not considered safety and seem to think you can derogate safety to another organisation i.e. the CAA. You cannot as you have not carried out a true independent risk analysis.