

**Title:**

Mr

**Forename:**

**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?:**

Personal details only

**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 charges are unreasonable and will pose a danger to flight 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?:**

Tables 5 and 6 includes areas that should be exempt from charges and hence should NOT be included.

**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?:**

No, I strongly disagree

**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?:**

Both options will have a negative effect.

**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.:**

1) Aeronautical spectrum usage is mandated to users by the Civil Aviation Authorities (CAAs). In contrast to other spectrum users e.g. mobile phone spectrum the usage of this spectrum is neither voluntary nor optional. Should these charges be implemented the frequency usage should be made voluntary and non mandatory in all airspace under the control of OFCOM fees including Class A through F airspace. OFCOM should therefore negotiate with all CAAs in control of airspace where OFCOM intends to implement these charges.

2) The proposed fees will have an adverse effect on air traffic safety. Small, non licensed airfields outside controlled airspace (Airspace class G) with fixed ground stations providing voluntary Ground to air safety relevant information -such as field condition and information about weather and other hazards to the safe conduct of flight- may choose to give up such services to maintain operational expenses at their

current level. This will unnecessarily put the safety of flight at risk. OFCOM should consider if even the loss of a single life due to an air incident as a consequence of a lack in communication facilities is worth the intended charges.

3) The timing of these proposed charges come at a period of the greatest recession in recent history. The aviation industry is already burdened with the consequences of the economic downturn. This has led to significant job losses in the UK and introducing additional charges into this already weakened sector may lead to further unemployment and will delay the recovery of this industry unnecessarily. It is unclear why OFCOM is choosing this particularly bad time for implementation. Should implementation not be avoided completely, implementation should at least be delayed until a full economic recovery is achieved.

**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. OFCOM has failed to consider the impact appropriately. The proposed charges will without doubt have a negative impact on air safety. Especially charges as high as £9,900 for vital services such as ATIS for airports that are already financially under pressure may lead to closure of these services. Shoreham airport (EGKA) is one example where this may become a problem within the proposed phase in period. Where new services are considered such as implementation of new instrument approaches the new charges are likely to delay or stop these proposals. One such example is Blackbushe (EGLK)