

Title:

Mr

Forename:

Richard

Surname:

Brown

Representing:

Organisation

Organisation (if applicable):

WLS Flying Group at White Waltham

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:

Yes

Additional comments:

In the case of GA operations I / We strongly believe that charging for the use of airfield, ground to air and air to ground frequencies is a cynical application of government power which should be suppressed at every stage, and I would vote against it at every opportunity.

16 PPL pilots

Question 1:We propose to derive fees for Air/Ground, Aerodrome Flight Information Service, Tower, Approach and ATIS assignments on a bespoke approach, under which fees would reflect the geographic impact of each individual assignment. What is your view of the merits of this approach compared with the alternative generic fees approach set out in the December 2010 statement?. Do you take the same view about all of these service types?:

Question 2:Where an assignments prevents re-use of a frequency across an area which is larger than the area of the UK land mass, it appears to make little difference to potential alternative UK users whether the affected area is only marginally greater or is several times greater than the area of the UK land mass. Do you take a different view? Are there any reasons why very large service areas and associated separation zones do have greater impact on the availability of frequencies than assignments which impact a smaller area equivalent only to the size of the UK land mass? If so, please provide a full explanation of how this effect operates.:

Question 3:We currently propose that there is little merit in notionally deriving fees for Area Control, ACARS, VOLMET and VDL assignments on a bespoke basis when fees will rarely, if ever, be other than £9900. However, we recognise that there may be merit in applying a bespoke approach to fee setting so that, if assignments are ever made which impact an area smaller than the area of the UK land mass, fees would be reduced proportionately. In your view, would a bespoke approach to fee setting for these service types have any practical value now or the near term?:

Question 4:Would there be any merit in fees for other assignment types being derived on a bespoke basis? If so, which other service types should be subject to bespoke fee and how should these fees be derived?:

Question 5:We are proposing to rely on ICAO's EUR Frequency Planning Manual when determining the size of the area in which one assignment prevents others from using the same frequency. For the purpose of setting fees, we propose not to take into account ICAO separation distance variables relating to adjacent channel use or bandwidth (although bandwidth will be reflected in fees as fees for 8.33 kHz and 50 kHz channels will be derived pro rata to fees for 25 kHz channels). We also propose to take into account the CAA's practice of applying, in the case of smaller DOCs, rules which ensure that an aircraft within one DOC cannot cause interference to the ground station of another. Are there other factors which should be taken into account when determining the size of the geographic area impacted by a particular assignment?:

Question 6:We are proposing that, until April 2016, bespoke fees should be capped at the level of the generic fees announced in December 2010. After that

date, no bespoke fees will rise beyond £9900 per 25 kHz bandwidth, but some Air/Ground, Aerodrome Flight Information Service and Tower assignments with a relatively large DOC will attract bespoke fees in excess of the £2600 generic fee set out in December 2010. Does this timetable provide sufficient time for licensees to review their operational needs and, where appropriate, agree changes to their DOC, before fees, for some licensees, increase beyond the level announced in December 2010?:

Question 7:We propose to introduce a new licence class for each of (a) Air/Ground, Aerodrome Flight Information Service and Tower, (b) Approach, (c) ATIS, (d) Area Control, (e) VOLMET, (f) ACARS, (g) VDL, (h) Aerodrome Surface, OPC and Offshore, (i) GA Sporting frequencies and (j) Fire and Emergency frequencies. Are there reasons why the portfolio of licence types should differ from this proposal?:

Question 8:Do you have any specific additional information about the likely financial impact on licensees of these proposals to apply bespoke fees, instead of generic fees, for certain service types?: