

General Lighthouse Authorities of the UK & Ireland

General comments on Consultation:

The bands being considered in this consultation are not specified, which makes it difficult to provide a definite response. It is assumed that the maritime services referred to are in the VHF band. In particular, it is assumed that the DGPS services are in the VHF band and not in the MF band, as that would require a quite different response.

The present use of the VHF band is known to be inefficient (analogue, 25 kHz channels). More efficient technical solutions (digital, 12.5 or 6.25 kHz channels) are known to be feasible. However, they require international agreement, which takes many years to achieve. One suggestion in this consultation is that channelling arrangements could be changed by individual licensees, so that they could transfer rights to parts of channels. This should be treated with great caution as the potential for harmful interference is considerable. These channels are used by ships from many countries visiting UK ports, or just passing through UK coastal areas. They are also used by ports in neighbouring countries, close enough to cause interference. If every proposal for spectrum trading needs to be scrutinised to ensure that interference will not result, then a major increase in technical resources will be required, far greater than deployed under the present regime.

The satellite bands under consideration are also not specified. Presumably they do not include those used for maritime safety and communications purposes, in particular by Inmarsat and SAR services. These are governed by international conventions and there would be serious repercussions if unilateral changes were made, whether interference is caused or not.

Note on The General Lighthouse Authorities:

The Corporation of Trinity House, the Commissioners of Northern Lighthouses (operating as the Northern Lighthouse Board) and the Commissioners of Irish Lights are the General Lighthouse Authorities (GLA) for the UK (including the Channel Islands and the Isle of Man) and the Republic of Ireland pursuant to the Merchant Shipping Act 1995, as amended and the Merchant Shipping Act 1894 in respect of the statutory undertaking of the Commissioners of Irish Lights in the Republic of Ireland. The GLA have statutory responsibility for the provision of maritime aids to navigation in UK and Irish waters, including radio-navigation systems. The GLA are therefore service providers using radio spectrum for safety of life and wreck-marking applications. The provision of maritime aids to navigation by the GLA is funded from Light Dues charged on certain ships, regardless of where they are registered, entering UK and Irish ports, but not on ships in transit through those waters. Light Dues are paid into the General Lighthouse Fund, which is administered by the Secretary of State for Transport pursuant to the Merchant Shipping legislation.

Question 1: Do you agree with our proposal to make maritime licences transferable and the proposed limitations on the types of transfer to be allowed?

From the context, it is assumed that it is the maritime VHF band that is under discussion here, although this is not stated.

This band is shared by many users in different locations. Trading of area-defined licences may be possible without detrimental effect, but it is not clear how harmful interference will be prevented if trading is allowed in licences that are not area-defined. In particular, changes to channel spacing should be treated with great caution, especially where those channels are used by non-UK ports and vessels.

Question 2: Do you agree with our proposal to make earth station licences in the satellite area transferable and the proposed limitations on the types of transfer to be allowed?

There is insufficient information on the bands and services involved to make a judgment as to whether these proposals are appropriate or not.