

By Stephen Winter

I consider that there are fundamental issues affecting the basis on which the proposal is based, I therefore have the following comments to make:-

1. The reason why VHF communication is used is to help ensure aircraft safety. This element is completely ignored in the report. Commercial air traffic has long been presenting a case that a "known air traffic environment" is important for the safe conduct of their flights. Similarly for General Aviation and Sport aviation, the ability to ensure safe flight is substantially enhanced by the use of radio, even in those airfields with small amounts of traffic. It allows a picture to be built up in the pilot's mind, of where other aircraft are in relation to the airfield circuit and so help prevent accidents. Any charges made in this sector of aviation will lead to a reduction in the number of airfields offering a basic air / ground service and will therefore lead to a reduction in safety.

Airfields protect their airspace by the use of Air Traffic Zones. These provide a small (2nm radius) portion of airspace to accommodate taking off and landing. In order to enter this airspace an incoming or transiting aircraft is required to make radio contact. Increasing charges will inevitably lead to a number of smaller airfields relinquishing their frequencies and so reduce the number of ATZs and so reducing safety. Ofcom should if anything be encouraging more and more airfields to establish radio stations.

2. It is stated that there is a significant shortage of frequencies available. The introduction of 8.33 khz spacing particularly for commercial aviation will substantially increase the number of frequencies available at a time when commercial air traffic is reducing. There has been no evidence provided to justify the shortage claim.
3. Pricing may well represent an efficient way of reducing the demand for a service, but that is based on the misunderstanding that the argument is based purely on economics. The larger commercial organisations will always have more finance available to bid for frequencies, but that does not take any account of the safety benefits that may accrue. Which provides the greater benefit, an additional frequency available at an airport for baggage delivery or an air to ground station helping to ensure a safe flying environment on a sunny summer afternoon? Financially I am sure the former could pay more, but the latter will save more lives.
4. There is an assumption that frequencies relinquished can be reused perhaps even for other purposes. My understanding is that these frequency bands are defined by international agreement for aeronautical purposes and as such cannot be reallocated. In fact if frequencies in the UK were reduced, it is likely that the frequencies could be reallocated to

other aviation use in Europe leading to a reduction in the spectrum available to the UK

5. The value that might occur from introducing the suggested revenue charges is not identified, nor is the cost of administering and enforcing such a system. Without this information there are no figures to indicate whether the monetary saving is worth the loss of life as result of degrading safety.

In conclusion, I believe that aviation safety is of paramount importance and that these proposals will do nothing other than decrease the levels of safety.

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