

**Title:**

Mr

**Forename:**

Duncan

**Surname:**

McFadyean

**Representing:**

Organisation

**Organisation (if applicable):**

Alterav

**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:**

**Question 1: Do you consider that our proposed fee rates for licences in the aeronautical VHF frequencies are appropriate?:**

No, they are not appropriate and will have a negative impact on ari safety. It is facecious to then say that this is the CAA's problem; there should be more joined-up

thinking in Government and a will to integrate regulation. This proposal goes counter to that.

**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?:**

See (1) above; any identification is in appropriate.

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

I agree that no action should be taken to levy fees in this or any other respect.

**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.

**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?:**

No. There should be no fees. Whilst you have chosen to cite Government policy as the reason for pursuit of the proposals, there should be a measured consideration of the appropriateness of those policies in this instance. Have you informed Government as to the usefulness of these proposals from a practical end-user standpoint? Aside from the revenue collection (less the cost of collection) neither the end user nor the consumers they serve or value to society will benefit from any enactment of the proposals.

**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 difficult to quantify ahead of enactment of the proposals, in the same way that the impact of your proposals have not been quantified. It is easy to see that efficiency will not be improved and that there will be a negative impact on both safety and on businesses.

The proposal has not costed the expense of increased prosecutions that civil resistance to the proposals will induce. Or the CAA having to use its legislative powers to redress safety issues emanating from an enactment of the proposals.

**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 it has not.

The proposals choose to ignore the contribution to safety that the current system provides, seeking to lay this problem with the CAA, but actually creating a problem that doesn't exist currently!