### Title:

Mr

#### Forename:

Stephen

#### Surname:

Butler

#### **Representing:**

Self

### **Organisation (if applicable):**

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

# Of com 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, this will effect safety in the air and on the ground. These fees appear to be a crude tax on a small group of the general public. Further I understand these frequencies are protected by international agreement.

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?:

None of these frequencies need taxation.

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

None of the frequencies need taxing, you are only leaving fire assignments alone because you know the public would never allow it and you could not win the argument.

# 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, again this will effect safety and put people out of work.

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?:

Your approach is to gather taxes from new sources, regardless of the impact this will have on safety both in the air and on the ground.

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.:

Sorry but I do not have quantified information you would like, however it is obvious that the impact will be to drive small operators out of the market. There will be less people employed and the aviation sector will become less safe.

# 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.:

There is no need to impose these fees, there are no gains in either public safety or business development. There will be a small initial gain in revenue raised but this will be offset in the longer term by unempolyment in a shrinking sector of enterprise.