

Title:

Mr

Forename:

CHRISTOPHER

Surname:

PEARSON

Representing:

Organisation

Organisation (if applicable):

Land's End Airport

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:

You may publish my response on receipt

Additional comments:

I find the whole concept of this proposal rather bizare and cannot understand how it has progressed to this stage. Let me explain.

When I was initially trained as an Air Traffic Control Officer one of the very first things we were taught was that our mission is to provide a safe, orderly and efficient

service. Common with other responses, I find that this proposal supports none of these key objectives because these proposed additional costs will undoubtedly result in the closure of some of these essential Air Traffic Service Units.

It is mandated (except in Class G airspace) that aircraft need to contact a ground station - primarily for the safety of all users. As such, we are providing a 'Safety Service' and as is common with all such services, we should be exempt from any charge except necessary administration costs. The CAA, aviation's main regulator, is allowed to make only a small profit. Ofcom should be subject to the same restriction.

Aviation - has had to suffer many recent regulatory costs, a huge rise in fuel costs (our Avgas cost price increased by 12.5ppl (excl VAT) this month and at best, a difficult trading period. Any thought of passing these proposed costs on to users will not be possible.

Ofcom must now reconsider these proposals and approach this sector from a new angle - one of safety not one of profit.

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

NO

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?:

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

YES

Question 4: Do you agree with our proposal to set a £75 fee for licences in any of the sporting frequencies?:

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?:

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

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.:

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