

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

City Airport (Manchester Barton)

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep name confidential

**If you want part of your response kept confidential, which parts?:**

As noted on question 7.

**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:**

We have noted that you have included movement figures for Manchester Barton within your consultation document. However, the figures you have provided are misleading, and when referenced in terms of calculating the fee impact on a per flight basis (ie per flight/landing fee), are incorrect. The airfield currently has about 15,000 flights per year, and not 31,849 as indicated. This means that the cost per flight/movement is more in line with Rochester, Turweston and Sturgate and not as indicated on Fig 4-5.

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

No. Whilst we understand the reasoning for review, it is felt that the fee being proposed (£2,600) remains unjustifiably high.

**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?:**

No particular comment.

**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?:**

It is felt that this is a reasonable maximum.

**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 Comment.

**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?:**

We agree that a phasing approach of 5 years is reasonable for the proposed AFIS level of charging.

**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.:**

The financial impact of this proposal is significant for our airfield. The airfield is run in accordance with a management contract that is required to break even, therefore to

absorb any increase in costs will require that it is passed on to the customers in order that it can be recouped. The General Aviation market has seen some decline over recent years with several rising costs such as fuel prices, and this increased cost represents yet a further burden to affect the financial viability of smaller GA airfields. We calculate that the cost of the proposed charge would require approximately a 2% increase in landing fees to cover the charge.

(below not for publication)

[Text redacted]

**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.:**

We believe the impact upon the smaller GA airfields will vary greatly depending on the sources of revenue available at each airfield. For example, at our airfield, no income is received from any property, and so the majority of the income must be derived from variable sources such as landing fees and fuel sales. These income streams are very dependant on the weather conditions. A good or poor Summer can mean the difference between being in profit or making a large loss. This increased charge reduces any profit and significant increases the risk of a larger loss if weather conditions are not favourable to flying during the Summer season.