

Title:

Forename:

Surname:

Name withheld

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name 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:

Dear Sir,

I write to comment on your proposal to introduce ?Administered Incentive Pricing? (AIP) charges for the use of aeronautical frequencies.

This proposal is fundamentally flawed.

The VHF aeronautical spectrum is allocated by international treaty, not by HMG. As this frequency range is protected under international treaty arrangements, vacated UK

Aeronautical VHF frequencies would therefore be of no use to other potential users or re-allocated to any other (non aeronautical) service. OFCOM would be unable to reallocate unused aeronautical frequencies to non-aeronautical users. Unlike many other uses of the radio spectrum there is no shortage of frequencies for use by airfields. The introduction of AIP charges would not promote more efficient or effective use of the VHF aeronautical frequency spectrum as it is already being effectively managed.

If charges of the scale proposed were introduced it is likely that small airfields would be unable to recoup the cost of the licence charge from users. The frequencies would become vacant and surrendered. VHF telecommunications have proved to be a great safety aid for aircraft and the imposition of AIP charges and the consequential closure of VHF ground stations would be detrimental to flight safety.

My understanding is that the situation with respect to frequency spectrum allocation is parallel to those existing for Amateur Radio. Users pay no official charges for the use of their ground stations, repeaters or frequency spectrum. Again, these frequencies are allocated by the International Telecommunication Convention and the UK is a member of the CEPT European Conference of Postal and Telecommunications Administrations.

The proposal has all the hallmarks of a stealth tax for which there is no conceivable justification.

I believe It would create an expensive and unproductive bureaucracy manned by civil servants with the primary objective of gathering funds to cover its own operational costs.

I therefore oppose the introduction of Aeronautical Spectrum pricing.

Yours sincerely,

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

No - Completely excessive. The charges proposed would only lead to smaller airfields abandoning their radio frequencies, leading to a reduction in flight safety.

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. It is utterly bizzare to even consider charging for this application!

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

No - I cannot agree with any part of the proposal as written.

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?:

As previous answer. No - I cannot agree with any part of the proposal as written.

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?:

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.: