

Title:

Forename:

Surname:

Withheld

Representing:

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:

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

No. They will result in safety being compromised.

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?:

As far as I can see you have identified all the aeronautical uses of VHF communications frequencies. However, I do not agree that they "require a distinct approach to fee setting" as you are suggesting.

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?:

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?:

This is beyond the scope of my knowledge/experience.

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. The proposal for higher fees is, in my opinion, misguided and will be detrimental to safety. The question as to whether these fees should be phased in is therefore irrelevant.

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.:

Annex 5 of your second consultation document, published on 18 December 2009, appears to be the Glossary of terms used in it, not an analysis of the proposed fees. However, from reading the Helios report it is clear that a full assessment of the impact on smaller airfields, many of which are already struggling financially, has not been carried out (and Helios refer to the already high costs for small airfields/aircraft owners and operators).

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.:

You do not appear to have understood that the primary use of aeronautical frequencies is safety related and seem to see them just as a means to raise money. The imposition of large fees will result in many airfields giving up their frequencies with a resulting negative impact on safety. As I believe has already been pointed out to you by AOPA, any actual or perceived shortage of frequencies could easily be solved by frequencies throughout Europe being allocated by one office instead of by each country individually.