

Title:

Forename:

Surname:

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:

Yes

Additional comments:

I consider these revised proposals - that aviation users should be charged for use of dedicated aeronautical frequencies, and that OFCOM should administer these frequencies and arrange the levying of these charges - no improvement on the earlier proposals. If anything they are worse, because they show that the drafters of the proposals could not or did not seek to understand the many clear objections to the first proposals.

These frequencies are essential to safety. Their allocation should be made on safety grounds alone, by aeronautical and radio professionals who understand all the technical and operational implications for all users

of UK airspace. These frequencies have no 'market value'; they cannot (by international agreements, which are themselves essential to global flight safety) be used for any non-aviation purpose. Properly allocated, they need not be and are not now in short supply. If any of them are given up for financial reasons by the current UK user, they are likely promptly to be taken up by a user in the near continent, and be lost to the UK for ever. A small airstrip which gives up its dedicated Air-Ground frequency for none (or for the sole SafetyCom frequency, used by other nearby airstrips, with potential for mutual confusion) is thereby going to be less safe. The regional airport with current dedicated Tower, Approach and ATIS frequencies, which gives up one of them to save money, is going to find the remaining ones crowded with more transmissions, increasing the likelihood of a vital, emergency-related, call not getting through; again, less safe. For such fields, with a limited number of aircraft movements and aircraft with a typically very small capacity, the cost per movement or per passenger of the aerodrome's 'frequency licence' may be very burdensome, making the difference between the economic feasibility of the flight or loss of it; models which show that the cost per passenger at Heathrow are irrelevant and unhelpful.

I would like to endorse all the detailed comments made in their response to this consultation by the Light Aircraft Association, of which I am a member. I am a Private Pilot (ex-military), whose flying training started in 1964. I am now flying light aircraft to and from all sorts of aerodromes from major regionals to the smallest private airstrips. I have flown civil aircraft in 4 nations on 2 continents from all sorts of aerodromes from the very largest to the smallest.

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?:

In view of the errors which others (eg in the LAA) have already discovered in your data, almost certainly not. What those researchers have discovered is that the drafters of your revised proposal have very little understanding of how aviation of all sorts uses those parts of the VHF spectrum allocated to it.

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?:

no, because OFCOM should not be charging any fees to users for any use of this spectrum

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, because OFCOM should not be charging any fees to users for any use of this spectrum

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.:

no, but your drafters clearly have little or no understanding of the contribution to the nation's economy of General Aviation in all its aspects, which to me makes all your financial modelling suspect

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. See Additional comments above