

Title:

Mr

Forename:

Peter

Surname:

Gristwood

Representing:

Organisation

Organisation (if applicable):

Phoenix Flying Group

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 consider this consultation seriously flawed.

It takes AIP as a given when this is by no means relevant to the Aviation sector

It pays lip-service to the needs of safety and yet the proposal will have a seriously

detrimental effect on safety for small airfields

We consider the proposals are an unjustified additional tax on a sector already burdened by costs.

We consider that the authors of this report have no idea of the consequences of this proposal as regards safety or viability of small airfields.

We have read the documentation of your consultants and it is clear to us that their logic is flawed and that anticipated costings are unjustified.

The proposal shows no understanding of the needs of the light aviation sector in regard to safety.

There is little doubt that many small airfields who currently utilise a frequency will give it up rather than have to pay a disproportionate increase in costs. This goes against every request of aviation safety organisations who are asking us to use our radios and transponders as much as possible to improve en-route safety and to avoid incursions.

We are wholly against this second ill-considered proposal which we are convinced is nothing more than a revenue-gathering exercise.

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

No. The levels are excessive and unjustified

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 comment

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

Yes, but there is a need to address other safety-related services

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

Unsure.

How are Safetycom, the cloud-flying and other general frequencies to be dealt with. This is not addressed in the proposal.

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?:

No. This assumes we agree with the level of charges, which we do not.

Our local airfield will attract a huge hike in charges which we consider inappropriate and unjustified.

In particular I would point out that our airfield is in a rural area some distance from another airfield. There is no competition for the frequency, yet you are proposing a 260% increase.

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.:

As in 6.

How can you possibly justify a 260% increase in charges where there is no competition.

Let me point out that because of the technical limitations of VHF radio airfields can share the same frequency. You do not address this fact and assume that each airfield requires exclusive access.

Where is there a discount for shared frequencies?

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.:

Absolutely not.

You appear to have ignored all previous comments and, in particular, the issue of the use of radio as a safety tool.

We use our radio to pass and receive information about en-route traffic and weather as well as essential information for our joining at a our arrival and departure airfields.

It is possible to do without this information but only at additional risk to life and limb.

Your proposal seems to believe that radio is optional and that is possible to apply AIP to us.

This is wrong-headed and could lead to a degradation of our current high level of safety.

Ofcom appear to have no interest in this and I will be writing to my MP on this matter. I cannot believe that a public organisation such as yourselves is permitted to discount issues of safety, as has been raised in many of the comments so far.

Consequently I believe this consultation is illegal and cannot withstand judicial review.

I look forward to seeing the head of Ofcom in court answering these criticisms rather than as the result of a fatal accident.