

**Title:**

Mr

**Forename:**

Richard

**Surname:**

Seth-Smith

**Representing:**

Self

**Organisation (if applicable):**

**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:**

No

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

Yes

**Additional comments:**

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

No. The charges as detailed, whether or not "phased in" will impact most heavily on the sectors which can least afford to pay them, and which have little opportunity to recover the costs. This applies particularly to a/g stations at small airfields in outlying areas; many of these have a relatively small amount of traffic on an annual basis but

become extremely congested in fine, summer weather. Having operated such an airfield I believe that a significant number of such 'fields will cease to use radio if these charges are imposed, and this will cause significant hazard both to based and visiting aircraft. Thus the imposition of these charges will impact significantly on 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?:**

I believe so

**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?:**

Given that many "aviation frequencies" such as a/g serve "sporting aviation" I do not understand why some should be charged less than others.

**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?:**

Not qualified to 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?:**

Whether or not the proposed charges are "phased in" the result will be a degradation of safety at many small general aviation airfields to the detriment both of the aviators and potentially to people living / working in the local area. The massive increase in costs of A/G and AFIS will encourage pilots not to use radio at a time when CAA is stressing the importance of improving aviation communications.

**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.:**

No. Given the scale of charges for a/g and afis (particularly a/g) it would appear that those devising the charging structure have little understanding of the financial structures in which small g/a airfields operate.

The European Parliament has instructed the Commission to instruct National Governments to ensure that the necessary structures exist for the viable operation of General Aviation and in particular small airfields in outlying areas. This charging structure will inflict significant damage on that sector