

**Title:**

Mr

**Forename:**

ROBERT

**Surname:**

JONES

**Representing:**

Organisation

**Organisation (if applicable):**

WELSHPOOL AIRPORT

**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:**

Yes

**Additional comments:**

This proposal of charges to Aeronautical VHF frequencies is a tax against safety. Small airfields cannot finance this vast increases in charging. It will result in small airfields giving up their frequencies, reducing the level of safety, and remove the ability of student pilots from these airfields to have the ability to use VHF frequencies as part of their training requirements. All airfields should fight against this form of

taxation, and contact their MP's enforcing the reduction in safety which will result through this proposal.

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

No there is no justification for this increase.  
A tax against 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?:**

These frequencies are in the aeronautical spectrum, and are not a salable entity

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

Fire frequencies are for safety requirements, as are VHF aeronautical frequencies

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

The fee for all VHF frequencies should be set to the same level.

**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. No justification for such an increase

**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?:**

The proposed fees cannot be justified.

**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.:**

These proposed fees are a tax against safety. Aviation will be a less safe environment if these proposals are allowed

**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.:**

Small airfields cannot recover the proposed increase in fees. The VHF frequencies will be given up leading to increase risk of accident.