

**Title:**

**Forename:**

Redacted

**Surname:**

Redacted

**Representing:**

Organisation

**Organisation (if applicable):**

Big Red Kite (aviation) Ltd

**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

**Comments:**

**Question 1: Do you consider that the fee rates set out in Table 8 for assignments in the eight core international maritime simplex channels are appropriate?:**

**Question 2: Do our revised proposals reflect appropriately the distinctions between the different uses of particular internationally allocated maritime channels, as set out in Table 9:**

**Question 3: Do you agree with our proposals not to set any fees for use of the calling and distress channels, the search and rescue channels, the AIS channels, or for exceptional shore-based use of the intership channels?:**

**Question 4: Do you agree with our proposals to set administrative cost-based fees for licences to use the package of 3 marina channels?:**

**Question 5: Do you agree with our proposal to set administrative cost-based fees for licences to use the internationally-allocated duplex channels?:**

**Question 6: Do you consider that the fee rates set out in Tables 10 and 11 for assignments in the UK-allocated working channels (that is, not including the search and rescue or marina channels) are appropriate?:**

**Question 7: Do our revised proposals correctly identify all of the UK allocated maritime channels which are assigned to specific applications which require a specific approach to fee setting, as set out in table 12:**

**Question 8: Do you agree with our proposal to set no fees to licensees for use of the two UK-allocated search and rescue channels?:**

**Question 9: If you are a maritime organisation with the safety of human life in an emergency as your sole or main objective, would you be interested in accessing spectrum for working purposes (ie other than SAR or other emergency response uses) under a private commons basis, shared with other users with the same objectives and co-ordinated by the MCA, and free of any spectrum fee?:**

**Question 10: Do you consider that our proposed fee rates for area-defined licences(where feasible) in the eight core internationally-allocated maritime simplex channels are appropriate?:**

**Question 11: Do you agree that area-defined licences in the international duplex channels should be based on a minimum cost of £75 for 4 squares, with larger areas priced on a case by case basis? :**

**Question 12: Do you consider that our proposed fee rates for area-defined licences in the UK allocated working channels (that is, not**

**including the search and rescue channels or the marina channel) are appropriate?:**

**Question 13: Do you agree with our proposal to set an administrative fee of £75 for maritime radio (suppliers and demonstration) licences?:**

**Question 14: Do you agree with our proposal to bring the arrangements for temporary maritime licences into line with those in other sectors?:**

**Question 15: Do our proposals for phasing in some of the proposed fee increases provide sufficient time for you to accommodate the additional costs, without undue disruption to your operations which could reasonably be avoided by a phasing arrangement? We would like to be able to publish all responses to this question. However, if you wish your response to this question to remain confidential, please provide your response on a separate sheet clearly marked to that effect. Your request for confidentiality will be respected:**

**Question 16: Do you consider that our phasing proposals for the maritime licences for which we propose to set AIP-based fees 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.:**

**Question 17: 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 7? We would like to publish all responses, but will respect the confidentiality of any material which is clearly marked as such.:**

**Question 18: If the Government were to assume the strategic management role for the radar and aeronautical navigation aids spectrum that we propose, do you agree that we should not develop proposals for AIP licence fees?:**

For the second time in a year or so I find myself objecting to a tax on safety. The aviation radio spectrum is protected by international agreement and so idea that you can sell off parts of the band to the highest bidder is false and so is no more than another stealth tax.

The aviation UK industry pays for the installation and maintenance of the communication and navigation stations, pays a licence fee to your authority to administer the radio spectrum, it simply can't afford to have this safety tax imposed on it when all the international competitors have governments that see the radio structure as in place to aid the safety of air traffic and to promote the economic development of the state for the good of all.

This AIP tax was roundly condemned by the industry last time it was raised and so withdrawn, perhaps it is time to ask why OFCOM has the resources to rehash this flawed and damaging idea so soon?