

Read in W/C 23/11/09

Mr Michael Richardson  
3.05 Spectrum Policy Group OFCOM  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

13 November 2009

*Your Ref: Applying spectrum pricing to the maritime sector, and new arrangements for the management of spectrum used for radar and aeronautical navigation aids*

Dear Sir,

I write to comment on your proposal to introduce 'Administered Incentive Pricing' (AIP) charges for the use of aeronautical frequencies.

This proposal is fundamentally flawed.

Firstly, there is no shortage of frequencies for use by airfields, so the introduction of AIP charges would not be able to promote more efficient or effective use of the VHF aeronautical frequency spectrum.

Secondly, the VHF aeronautical spectrum is allocated by international treaty, not by HMG. Under international treaty arrangements, vacated UK Aeronautical VHF frequencies would have to be abandoned by the UK and would therefore be of no use to any other service. OFCOM would be unable to reallocate unused aeronautical frequencies to non-aeronautical users. The frequencies would be reallocated by the World Radio Conference.

If charges were introduced it is likely that small airfields, most of which run on a financial shoestring whether CAA-licensed or not, would be unable to recoup the cost of the licence charge from users. The frequencies would become vacant and surrendered. VHF telecommunications have proved to be a great safety aid for aircraft. The imposition of AIP charges and the consequential closure of VHF ground stations would be detrimental to flight safety.

The situation with respect to frequency spectrum allocation is exactly parallel to those existing for Amateur Radio, whose practitioners pay no official charges for the use of their ground stations, repeaters or frequency spectrum. Again, these frequencies are allocated by the International Telecommunication Convention and the UK is a member of the CEPT European Conference of Postal and Telecommunications Administrations.

Given the fact that spectrum pricing will do nothing to enhance the public good, the proposal has all the hallmarks of a stealth tax for which there is no conceivable justification. It would create an expensive and unproductive bureaucracy manned by even more civil servants with the objective of gathering funds to cover its own operational costs; another official drag and drain on business efficiency.

The frequency spectrum, like the air we breathe, is a public good. It should not be a nice little earner for the Treasury. I therefore oppose the introduction of AIP charges.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Graham Clark'.

Graham Clark