

## **BASIC DETAILS**

Consultation title: Applying spectrum pricing to the maritime sector

To (Ofcom contact): Michael Richardson

Name of respondent: David Hall

Representing (self or organisation/s): David Hall Systems Ltd

Address (if not received by email):

## **CONFIDENTIALITY**

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing                      Nothing confidential

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

## **DECLARATION**

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Signed (if hard copy) D. J. Hall

*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?*

## **Response**

No comment

*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*

## **Response**

No comment

*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?*

**Response**

No comment

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

**Response**

No comment

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

**Response**

No comment

*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?*

**Response**

No comment

*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*

**Response**

No comment

*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?*

**Response**

No comment

*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?*

**Response**

No comment

*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?*

**Response**

No comment

*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?*

**Response**

No comment

*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?*

**Response**

No comment

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

**Response**

No comment

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

**Response**

No comment

*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*

**Response**

No comment

*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.*

**Response**

No comment

*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.*

**Response**

No comment

*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?*

**Response**

Agree that in the current situation Ofcom should not do any further work developing AIP license fees for these applications. However we consider that currently the proposals for transferring responsibility to the government are immature and further information is required before any final decision can be reached.

We consider that the current difficulty with the proposed use of IMT in the 2.6 GHz spectrum band and the sensitivity of S-band aviation radar to these emissions makes the transfer of responsibility to Government more difficult to support. To address issues of this type there needs to be a single entity with a complete overview of all the issues but by splitting the responsibility between two different bodies this total oversight will be lost making it difficult to address any issues which may arise. Thus there is a need for a full debate and consideration of all the implications before taking any decisions on this transfer of responsibility.