

**Title:**

Mr

**Forename:**

Graeme

**Surname:**

Hammond

**Representing:**

Self

**Organisation (if applicable):**

Scottish Aero Club

**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:**

You may publish my response on receipt

**Comments:**

In your consultation document you outline the principles for charging for aeronautical frequencies (para 1.6 and 1.8) but then go on at para 1.9 to set out a policy that purports to allow AIP to be charged - even though the frequencies cannot be used for any other purpose.

There is a grave danger that your proposals will result in costs (a tax) that is beyond the reach of some aeronautical users. This could have serious safety issues.

Minor airfields may not be able to justify the cost of a VHF com frequency and will go without, so increasing risk.

However this would be of no financial benefit to OFCOM, since a frequency so given up cannot be passed on to a new user and must be returned to the European pool for reallocation.

Thus although the income (tax) derived from spectrum may be increased, the value derived by society from the frequency does not increase as the frequency is lost to UK society.

Major airfields must already have sufficient frequencies or their licence to operate would have been withdrawn by the CAA and the cost of using an additional frequency (paying controllers and running control positions) would far exceed the likely AIP charge. So it is improbable that airports or ATS providers would have surplus frequency holdings.

If this AIP policy were applied and an aeronautical user decided to pay more for a frequency than the existing user could afford (and assuming for a moment that the frequency could be reallocated by the UK), the existing user would have to manage without VHF com or go out of business. If they remained in business their risk is likely to increase and if the CAA judged it unacceptable they would have to intervene to force the frequency to be retained or revoke the airfield licence. But the airfield could continue to operate unlicensed with the risk already identified as unacceptable by the CAA. Intervention would destroy the AIP market.

Thus the UK would lose aviation infrastructure and suffer increased risk to life and property with no increase in value from spectrum - contrary to the aims of AIP.

Graeme Hammond

Private pilot

Member of the Scottish Aero Club and the Light Aircraft Association

**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?:**

See my earlier comments