

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: proposals on applying spectrum pricing to the maritime and aeronautical sectors.

To (Ofcom contact): spectrum pricing person

Name of respondent: Tim houlihan

Representing (self or organisation/s): self

Address (if not received by email):

CONFIDENTIALITY

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

Nothing

☐

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If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the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

Signed (if hard copy)

I note with disappointment that OFCOM is consulting with the aim of charging for the use of frequencies within the International aircraft band,

In the specific case of aircraft safety, as it applies to myself, I operate out of a small unlicensed airfield and use the CAA approved frequency for the airfield, to maintain a degree of positional information for users to achieve safe flight within the local area, if a completely unwarranted charge was to be imposed for this service my personal safety will be compromised as the operator of the farm would be unlikely to pay OFCOM for the use of a feature that has other people's safety as its sole objective.

The frequency in use at my base airfield is also used at other locations within the UK by arrangement of the CAA so how would an equitable method of sharing any imposed tax by OFCOM be made.

The idea that you could charge for the use of the airband frequencies based on the notion that other non aviation users would pay more to take over frequencies that are only used to enable safer aviation is distinctly unlikely as the frequencies are used solely for aviation as agreed by international treaty.

I notice that the statement I previously found on the OFCOM web site indicating that OFCOM would only resolve known problems and not make changes otherwise has now been removed or made much less obvious. Could someone from OFCOM please advise me when and why that change was made.

The use of frequencies within the "airband" is covered by international agreement, how does OFCOM intend to implement the changes implied in the consultation process and maintain the UK's International obligations.

I understand that OFCOM is not supposed to be a profit centre (unlike the CAA) could you confirm this to me? If I am correct why is OFCOM putting so much effort into rearranging internationally agreed usage of this tiny part of the radio spectrum when much greater problems require attention.

I contest one of OFCOMS statements where it states the radio spectrum is finite. As technology progresses the useable spectrum is constantly expanding in functionality and usability. If the question "what are the upper and lower limits of the radio spectrum" had been asked when I was being taught the latest RADAR techniques in 1963 it would have delivered a different answer in the 21 century as the functionally useable spectrum has expanded greatly. If OFCOM thinks that no further increase in the useable spectrum will take place then they are denying the obvious.

OFCOMS reasoning that pricing will improve the Aeronautical VHF band is so poor that it is impossible to give a reasoned argument against the proposal. If no further information can be provided to support this then this unfounded statement must be reversed.